



February 14, 2022

Honourable Minister Clark
Ministry of Municipal Affairs and Housing
777 Bay St, 17th Floor
Toronto, ON M5G 2E5

Dear Minister Clark,

Thank you for providing the opportunity to offer feedback on increasing housing affordability in Ontario. Your government's commitment to this issue is evidenced by the recent Western Ontario Wardens' Caucus Multi-Ministers Delegation at ROMA 2022 that we both attended as well as the just released "Report of the Ontario Housing Affordability Task Force".

The Task Force makes a very strong case that in order to meet the housing needs of our citizens, there is no time to waste and the need for new approaches is imperative.

With the foregoing in mind, I offer the following specific observations for your ministry's consideration, borne out of our own local experiences in Tecumseh, as we collectively move forward in addressing this need:

- 1) The Task Force reinforces that which has been known for some time – we must make better use of our existing infrastructure and accommodate residential intensification in both existing built-up areas and new growth areas. However, such approaches are often met with NIMBYism and I therefore support the reforms recommended by the Task Force in relation to limiting the available appeals and establishing as-of-right zoning to foster construction of the "missing middle";
- 2) The return of "de novo" hearings to the OLT has added unnecessary time and cost to zoning appeals. Moreover, it disregards the time, effort, cost and local decision-making authority of the municipality and the proponent in navigating the Planning Act and policy framework to that point. I ask that the Ministry consider replacing this model with one similar to the prior concept of the OLT exclusively reviewing the material that had been placed before a Council in making its decision and determining the merits of an appeal on that basis;
- 3) Faster approvals are sought by all involved in housing development proposals. The Task Force has rightly noted that part of the solution is through delegating decision-making for site plan approvals and minor variance applications to qualified Administrative staff. The Ministry should also give consideration to other time-saving concessions, such as eliminating the need for public notification for minor variances regarding applications on lands designated and zoned for the proposed use.

- 4) the Task Force has identified a shortage in skilled trades necessary to build the infrastructure and housing required to meet this crisis. While this is true, I would also like to note that there is an acute labour shortage of properly qualified building officials. Our experience, and that of other municipalities, is that there is an urgent need to train and certify more building officials in Ontario if we are going to be able to properly review plans and inspect construction at the rates anticipated by the Task Force. The shortage of building officials is adversely affecting us today and will only become more challenging as we provide more housing at a quicker pace;
- 5) the introduction of new forms of flexible zoning that does away with exclusionary zoning was found by the Task Force to be an important part of creating more housing opportunities in a timely manner. Also at issue, is the lag often experienced by municipalities between finishing a new Official Plan or a comprehensive review and bringing the implementing zoning by-law up to date. Municipal modernization funding for municipalities to align their zoning by-laws with new policies and remove exclusionary zoning and standards is respectfully requested to make these changes in a timely manner;
- 6) with respect to recommendation 18 of the Report, we question whether allowing appeals of Official Plans for “developers” wouldn’t also open up the opportunity for appeals across the board, which could be counter-intuitive to the desire to reduce delays. It seems that other changes recommended by the Task Force to create more flexible municipal housing policies province-wide will negate the need for such an appeal right. Having said that, the recommendations (26-31) for preventing abuse of the appeal process are well advised;
- 7) The Task Force makes the following statement after recommendation 49 on page 24 of its Report: “We believe that the province should consider partial grants to subsidize municipalities that waive development charges for affordable housing and for purpose-built rental”. I would strongly recommend that your ministry consider such a funding model with municipalities in order to incentivize more construction while providing necessary funding to municipalities for the infrastructure needed to support growth. Not only will this support new housing development, it will also assist with post-pandemic economic recovery.

Lastly, I would respectfully submit that affordable housing is not just a big city issue. Any financial supports contemplated by the Ministry in addressing these recommendations should also be available to smaller, urban municipalities. Every serviced acre represents an opportunity for housing development and intensification.

We look forward to on-going collaboration between the Province and its municipalities as we collectively strive to make prompt changes in order to address the housing affordability crisis.

Regards,



Gary McNamara
Mayor