

February 10, 2022

Hon. Steve Clark
Minister of Municipal Affairs & Housing
17th Floor – 777 Bay Street
Toronto, ON
M7A 2J3

Re: OPPI's Top 10 Housing Supply & Affordability Recommendations

Dear Minister Clark,

On behalf of the Ontario Professional Planners Institute (OPPI), I am pleased to provide our Top 10 recommended measures to address housing supply and affordability in the Province of Ontario.

This letter builds on the initial three recommendations from our December 20th submission to the Housing Affordability Task Force. We hope you consider these additional recommendations as you receive the Task Force report and develop the government's action plan to address the housing affordability crisis in Ontario.

Overview of Top 10 Recommendations

1. Create a Chief Planner of Ontario with oversight of municipal implementation of provincial plans.
2. Encourage Community Planning Permit Systems in Strategic Growth Areas.
3. Require RPP sign-off on Planning Justification Reports to ensure completeness of applications.
4. Establish a Planning Modernization Fund to align outdated zoning with Official Plans.
5. Align provincial infrastructure funding with growth planning to address servicing gaps.
6. Lead development of a single data standard for planning and development applications.
7. Enhance delegation framework for technical planning implementation approvals.
8. Drive more affordable units into the mix of new housing supply.
9. Promote innovative approaches and provide rehabilitation funding for social housing.
10. Provide provincial policy stability in land use planning once upcoming changes are in place.

About OPPI

OPPI is the recognized voice of Ontario's planning profession. With over 4,600 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions.

RPPs are skilled, professional, and dependable navigators employed to help lead communities towards the Ontario of tomorrow. RPPs are the local experts who bring together differing points of view; they

consult and develop recommendations that provide informed choices for decision-makers and elected officials. RPPs act in the public interest as professionals who work to improve the quality and livability of communities in Ontario today and for their sustainability long-term.

Introduction

OPPI has worked with the government to advance measures to streamline the land use planning approvals process in the Province of Ontario. We recently collaborated with stakeholders across the municipal and development sector to seek changes to the *Planning Act* that enhance delegation of minor approvals. We thank Minister Clark for adopting these measures in Schedule 19 of Bill 13, *Supporting People and Businesses Act, 2021*.

Additional delegation will help, but it is not the panacea for the housing affordability crisis in Ontario. There is much more work to be done at all levels of government to create a comprehensive plan that adequately addresses this generational challenge.

Many barriers have been identified and solutions proposed by stakeholders in the past few months which we have read with interest. Some innovative and worthy concepts are emerging. OPPI will focus our recommendations on measures that directly relate to actions the provincial government can take regarding land use planning matters.

OPPI's Top 10 Recommendations

1. Create an Office of the Chief Planner of Ontario (CPO) as an independent, non-partisan Office of the Legislative Assembly to provide oversight of municipal implementation of provincial land use plans and policies.

- A recent [report](#) by the Auditor General of Ontario found significant oversight, reporting and guidance challenges relating to municipal implementation of provincial land use plans and policies. Some of the key findings included:
 - Minimal information is available on the outcomes of policies associated with the Growth Plan for the Greater Golden Horseshoe. The province has only once reported on municipal implementation progress since the Plan's inception.
 - Many municipalities are falling short of targets in the Plan. Only four of the 25 Urban Growth Centres are on pace to meet their density targets by 2031.¹
 - Municipalities receive insufficient guidance on how to implement policies in provincial plans. In a survey of municipal planners, 70% of respondents said they lacked sufficient guidance or direction from provincial staff.²

¹ Office of the Auditor General of Ontario (December 2021), *Value-for-Money Audit: Land-Use Planning in the Greater Golden Horseshoe*, p. 26.

² Office of the Auditor General of Ontario (December 2021), *Value-for-Money Audit: Land-Use Planning in the Greater Golden Horseshoe*, p. 3.

- The Chief Planner of Ontario (CPO) would serve to address these gaps by operating as an arm's length oversight and advisory function for municipal implementation of provincial planning policy.
- The CPO would publish an annual report on progress towards implementation of provincial land use plans and policies including growth targets. The report would include a macro assessment of the implementation landscape. It would also include a micro review of major municipalities to identify specific policies and/or targets that are lagging.
- The CPO would provide recommendations to municipalities that are misaligned with provincial plans and policies on a path to conformity.
- The CPO would also assist in resolving differences amongst Provincial Ministries on land use planning policies and plans at the municipal level.

2. Encourage Community Planning Permit Systems (CPPS) in Strategic Growth Areas by providing implementation funding to municipalities.

- A CPPS is an existing *Planning Act* tool that combines Zoning By-Law Amendment, Site Plan and Minor Variance into a single streamlined application and approval process. Once implemented the process can significantly speed up the approval process, but there has been limited uptake in Ontario.
- **The Province should encourage use of a CPPS** in Strategic Growth Areas as set out in the Growth Plan for the Greater Golden Horseshoe (i.e., Urban Growth Centres, Major Transit Station Areas, intensification corridors).
- As an incentive to drive uptake, the Province should provide full implementation funding to municipalities that choose to implement a CPPS through the proposed Planning Modernization Fund (further details below).
- Provincial standards should be set for a CPPS that include alignment of height and density with the Official Plan.

3. Require Registered Professional Planner (RPP) sign-off on Planning Justification Reports to indicate completeness of application prior to submission by a proponent.

- Municipalities have consistently raised significant concerns with delays caused by poor quality and incomplete applications submitted by proponents.
- Currently, proponents are required to prepare a Planning Justification Report for a major application including Official Plan Amendment, Zoning By-law Amendment, Draft Plan of Subdivision, and/or Site Plan under the *Planning Act*. This report provides necessary background, overview, and planning rationale for the submission.
- To improve completeness of applications, **the Province should require Planning Justification Reports be signed off by a Registered Professional Planner (RPP)** prior to

submission. The RPP would use professional judgement to attest to the completeness of the submission.

- An upfront rigorous review by an RPP would serve to reduce unnecessary time going back and forth between the proponent and municipality to address missing aspects of the submission.

4. Establish a Planning Modernization Fund to align outdated zoning with Official Plans.

- Municipalities raise resourcing as the primary barrier to updating zoning after new Official Plans are approved. This “out-of-date” zoning necessitates Zoning By-Law Amendments which could add as many as 18 or more months to the approval process in some large municipalities.
- **The Province should create a Planning Modernization Fund** that provides grants to municipal planning departments to obtain sufficient resources to update zoning and/or implement a CPPS to conform with new Official Plans. This can be funded by allocating 1% of Land Transfer Tax revenue to the program on an ongoing basis to support municipal planning capacity.
- Funding for local planning by other orders of government is not a novel concept. Historically, the Government of Ontario has provided various planning grants including the Community Planning Service Grant (CPSG).
- Ontario recently announced a [Streamline Development Approval Fund](#) to accelerate processes for managing and approving housing applications. This fund could likely be used to update zoning or implement a CPPS. However, competitive demands on this fund would still necessitate a dedicated fund to ensure sufficient resources are allocated for these initiatives.

5. Align provincial infrastructure funding and financing programs with the Growth Plan for the Greater Golden Horseshoe to ensure provincial support is targeted towards essential servicing for new housing developments.

- Servicing costs continue to be a significant impediment to making greenfield lands available for housing development as well as realizing intensification in areas of antiquated infrastructure. Limitations to municipal debt capacity pose challenges that often impede adequate and timely servicing.
- Without adequate resources for key infrastructure, streamlining zoning and the application process will have little impact on housing supply.
- The Province should review all existing municipal infrastructure funding and financing programs and seek to **prioritize support towards gaps in servicing for new housing developments**. This, in effect, would align existing water, wastewater and other provincial funding for municipal infrastructure with growth planning.

- In addition, the Province should also review Ontario’s Long-Term Infrastructure Plan (LTIP) and align investments in provincially-owned assets such as schools, hospitals, and transit to municipal growth plans.
- Private-public partnership to ensure access to reliable broadband should also be explored to ensure new housing development has appropriate connectivity in the new age of telecommuting.

6. Lead the development of a single data standard for planning and development applications in collaboration with municipalities and industry.

- Some municipalities have moved towards e-permitting; however, platforms are siloed, fragmented, and do not take into consideration the multiple government agencies that may need to be consulted.
- There are no clear and consistent data standards or guidelines across these various commenting and approval agencies. The outcome is a complex array of multi-layered processes that add time and cost to the approval of housing projects.
- **The Province should lead a data standardization initiative** in partnership with relevant stakeholders. Approaches could include supporting existing initiatives or conducting a joint procurement with the Association of Municipalities of Ontario (AMO). Key principles should include avoiding vendor lock-in and open standards.
- This can build on recent successes in the building permit space where AMO collaborated with the Municipal Property Assessment Corporation (MPAC), a provincial agency, to procure Cloudpermit as an approved e-permitting platform for building permits in Ontario.

7. Enhance delegation framework for technical planning implementation approvals.

- The Province recently expanded the ability of municipal councils to delegate minor planning approvals. However, **the Province should go further and provide heads of planning departments with the authority to approve certain minor applications**. These delegated approvals could “bump up” to Council at its discretion.
- This would speed up the approval process by authorizing expert planning staff to review and approve technical implementation aspects of housing projects instead of waiting for Council meetings and agenda time.
- Delegation by elected Councils is a proven method to reduce approval timelines. A recent survey, conducted by OPPI, found that where delegations were in place, 63% of heads of planning departments reported a reduction in development approval timeline of 2-3 months and 11% reported a reduction of 4-5 months.
- The initial list of technical approvals that should be at the discretion of heads of planning departments include Draft Plan of Subdivisions, Site Plan, Lifting of Holding Provisions and Part Lot Control, Consents within the Built-Up Area, and Validation Certificates.

8. Drive more affordable units into the mix of new housing supply.

- A comprehensive housing strategy should include a suite of policies that **create incentives for affordable housing units** within the mix of new supply. These could include:
 - An as-of-right framework developed in partnership with the municipal sector to unlock affordable infill development on existing apartment sites.
 - Allowing municipalities to provide density bonusing in exchange for affordability requirements, including as part of inclusionary zoning by-laws.
 - Requirement for municipalities to have a separate queue for processing affordable housing applications to expedite approval.
 - Financial incentives such as provincial rebates for Development Charges and HST for affordable housing projects.
- The approach should also **drive specific design features within new affordable housing units**, including:
 - An appropriate mix of unit sizes that align with the nature of households, and in locations with access to local transit options.
 - Net zero heating and cooling, environmentally friendly elements, and higher quality materials.
- Private-public partnerships could be pursued to achieve some of these objectives.

9. Promote innovative approaches and provide capital funding for rehabilitation of existing social housing stock.

- Municipalities continue to struggle with maintaining existing social housing stock in a state-of-good repair. There are stories of social housing units being decommissioned due to health and safety concerns at a time when we face significant shortages and long waitlists.
- **The Province should create a Social Housing Centre of Excellence** aimed at developing and sharing innovative solutions to address the deferred maintenance crisis in Ontario's existing social housing stock.
- The Centre can share best practices and provide templates and training on successful approaches, such as ones used in the Regent Park, Lawrence Heights, or Alexandra Park Revitalization projects.
- **The Province should also provide dedicated and ongoing rehabilitation funding to social housing providers.** One approach could be to dedicate 25% of Land Transfer Tax revenue towards the initiative.

10. Provide provincial policy stability in land use planning once upcoming changes are in place.

- Frequent provincial reviews and changes to plans and policies serve as a barrier to new housing development. Municipal capacity to adapt often lags changes to provincial plans.
- For example, the Province amended the Growth Plan for the Greater Golden Horseshoe in 2017 and provided municipalities five years to come into conformity. However, the Province made further amendments in 2019 and then again in 2020 before municipalities had a chance to conform to the previous changes. This further delayed the process as many municipalities had to redo studies and planning work.
- The Auditor General of Ontario noted in her December 2021 report that, “*numerous changes in policies have created instability in the land use planning process*”.
- Once the upcoming round of policy changes are in place, **the Province should provide a period of policy stability to allow municipalities to adapt to the new regime.**

In implementation of upcoming policy changes, the Province should apply an equity lens to ensure actions include solutions that address the inequities in accessing housing that Black, Indigenous, and People of Colour (BIPOC) face.

Conclusion

Many challenges have led to Ontario’s current housing affordability crisis. Some of these go beyond the land use planning policy framework and could be driven by a low interest rate environment, speculative demand, labour shortages and other factors.

Within the land use planning policy regime, there are many potential changes to plans and policies that could help accelerate housing supply, however our submission was intended to focus on our Top 10 recommendations.

As we look ahead to government consideration of recommendations by the Housing Affordability Task Force and other stakeholders, OPPI would value an opportunity to provide ongoing advice to the Ministry as it seeks to implement changes to address Ontario’s housing affordability crisis. We kindly request a role in any implementation advisory tables setup by the Ministry on housing and other planning issues.

If you and/or Ministry staff have any questions on our proposed measures, please feel free to contact Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



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President
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Susan Wiggins, CAE, Hon IDC
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