

From: ZZG-RegionalClerk
Subject: Mayor Crombie Letter- City of Mississauga Response to Housing Affordability Task Force Report

From: Shaila Kibria Carter <Shaila.Carter@mississauga.ca> **On Behalf Of** Mayor Bonnie Crombie
Sent: March 3, 2022 4:27 PM
To: 'steve.clark@pc.ola.org' <steve.clark@pc.ola.org>
Cc: 'doug.fordco@pc.ola.org' <doug.fordco@pc.ola.org>; 'Premier@ontario.ca' <Premier@ontario.ca>; 'peter.bethlenfalvyco@pc.ola.org' <peter.bethlenfalvyco@pc.ola.org>; 'peter.bethlenfalvy@pc.ola.org' <peter.bethlenfalvy@pc.ola.org>; 'jake.lawrence@scotiabank.com' <jake.lawrence@scotiabank.com>; 'HousingSupply@ontario.ca' <HousingSupply@ontario.ca>; 'deepak.anand@pc.ola.org' <deepak.anand@pc.ola.org>; 'rudy.cuzzetto@pc.ola.org' <rudy.cuzzetto@pc.ola.org>; 'Cuzzettoco, Rudy' <rudy.cuzzettoco@pc.ola.org>; 'Kusendova, Natalia' <natalia.kusendova@pc.ola.org>; 'nina.tangri@pc.ola.org' <nina.tangri@pc.ola.org>; 'kaleed.rasheed@pc.ola.org' <kaleed.rasheed@pc.ola.org>; 'sheref.sabawy@pc.ola.org' <sheref.sabawy@pc.ola.org>; 'brosborough@amo.on.ca' <brosborough@amo.on.ca>; 'FCM Communiqué' <communiqué@fcm.ca>; 'michelle@ontariobigcitymayors.ca' <michelle@ontariobigcitymayors.ca>; 'Iannicca, Nando' <nando.iannicca@peelregion.ca>
Subject: Mayor Crombie Letter- City of Mississauga Response to Housing Affordability Task Force Report

Dear Minister Clarke,

Please see attached the City of Mississauga's response to the Housing Affordability Task Force. I appreciate your commitment to addressing the housing crisis that we are facing in Mississauga and across Ontario. I look forward to continuing to engage with you as your government works to develop new legislation and regulations to address this crisis. I am available to meet to discuss our response further should you be available to meet.

Regards,



Mayor Bonnie Crombie
T 905-896-5555 |
twitter.com/BonnieCrombie
mayor@mississauga.ca

Sign up for the Mayor's eNewsletter at www.mayorcrombie.ca

Please consider the environment before printing.

RECEIVED

March 4, 2022

REGION OF PEEL
OFFICE OF THE REGIONAL CLERK

(Copies of Appendix 1 titled "Ontario's Housing Affordability Task Force Report" to Mayor Crombie's Letter are available from the Office of the Regional Clerk)

REFERRAL TO _____
RECOMMENDED _____
DIRECTION REQUIRED _____
RECEIPT RECOMMENDED ☒ _____



Bonnie Crombie, MBA, ICD.D
Mayor, City of Mississauga
T 905-896-5555 F 905-896-5879
mayor@mississauga.ca

March 03, 2022

Hon. Steve Clark,
Minister of Municipal Affairs and Housing
99 Wellesley Street West
Toronto, M7A 1A2

City of Mississauga
300 City Centre Drive
MISSISSAUGA ON L5B 3C1
mayorcrombie.ca

RE: Response to Housing Affordability Task Force Report

Dear Minister Clark,

I write to you on behalf of Mississauga Council, to provide our City's response to the Housing Affordability Task Force (HATF). I appreciate your commitment to addressing the housing crisis that we are facing in Mississauga and across Ontario. Please find attached our thorough analysis and feedback on the fifty-five recommendations that were presented by the Task Force. We share your commitment to build more housing in Ontario, and more specifically, more affordable housing for middle-income earners. No level of government can address this crisis on its own – we need all three levels of government to work together.

Mississauga's Concerns

Mississauga is in agreement with approximately half of the recommendations contained in this report. Overall, our primary concern is that if operationalized, these recommendations may help increase housing supply, but will not do anything to make housing more affordable for middle income families. At the end of the day, we need measures from both levels of government to cool the market, support first time home-buyers, and curb foreign investment through taxation. Furthermore, some of the recommendations do not apply to the City or we have already taken significant action on, such as the use of electronic permitting. However, we do have some serious concerns about a number of the recommendations:

- At a high level, the erosion of local input and control of planning as well as the challenges of a one-size-fits all province-wide planning regime is concerning. Simply adding more supply does not necessarily mean there will be greater affordability. In Mississauga's downtown core, we've had unlimited height and densities for 20 years, but have not seen that translate into a significant amount affordable units a result.

- We do not believe that waiving DCs will do anything to address affordability or result in a lower priced home. While it would lower the cost to the developer to build, it is debatable whether it would reduce the ultimate price to the consumer. As we have seen throughout this housing crisis, the market dictates the price.
- We are concerned about what will happen to our neighbourhoods if increased density is permitted as of right. Mississauga is supportive and is working to encourage gentle density – additional units, laneway houses, and garden suites – but significantly increasing density will dramatically change the character of our neighbourhoods.
- Growth must pay for growth, but some of the recommendations in the HATF report would undermine the collection of development charges and cash in lieu of parkland and put the burden of new development on existing ratepayers. This must be avoided; and
- Too much of the emphasis in the Taskforce report is on municipalities. It would have been important for a municipal representative to sit on the task force to lend our perspective. While cities are in charge of a great deal of planning, we are not the primary source of delays in building housing, especially affordable housing. There are market dynamics and other factors at play beyond our control. Developers and the province both have a role to play in improving the development process.

Mississauga's Building division is a municipal leader as well as a willing industry partner. We are always looking for opportunities to improve how we do business. In 2021, Mississauga issued over \$2.1 billion in building permits. In addition we have continued to refine and invest in our electronic submission solution to meet the needs of developers and streamline the development approval process to get product to market in a timely fashion. These investments coupled with sound business practices have helped us to meet our legislated building permit approval targets 95%+ of the time.

Not accounted for in the report are the thousands of units that have been approved but not yet built. In Mississauga that number is 20,000, with another 40,000 in our downtown core alone that have been pre-zoned and could be built at an accelerated rate. Approximately 90% of these approved units are apartments and are located in every area of our city. They are not basement apartments or home additions/renovations. These approved units stem from 60 separate zoning applications, dating back to 2000, so over a 22 year span. This must be factored in by your government before you take action. Putting a legislated time limit on when a permit can be pulled after approval would help ensure units get built faster. The development community has a significant role to play.

Recommendations

With this in mind, we have developed a list of potential tools and process changes that can empower municipalities and support affordable housing into the future:

- Develop a mechanism to discourage short-term investor owned residential real estate.
- Leverage the potential of provincially and federally owned land for affordable housing.

- Apply HST rebates for affordable housing, make revenue tools available to municipalities to raise funds for affordable housing and offer direct funding to municipalities to support middle-income workforce housing.
- Require a Registered Professional Planner (RPP) to sign-off on planning reports prior to submission to speed up applications by improving their quality and completeness.
- Provide municipalities with the power to zone for residential rental tenure so that new multi-residential developments, particularly on large sites or at key strategic locations (transit stations), must include both rental and ownership housing.
- Expand the City's ability to obtain off-site works (such as streetscape and road improvements) from removal of Holding Provision applications, as well as Rezoning and Site Plan applications, which would reduce overall processing time and eliminate the need for additional applications.
- Extend the two year prohibition of new Official Plan Amendment requests from property owners/developers to at least five years to help stabilize land prices
- Implement the ability to use zoning expiration regulations (use-it or lose it zoning) to realize the approved-but-not-built backlog units and to more efficiently allocate servicing capacity.
- Allow Conditional Zoning to be used to mandate rental units or to provide an incentive for developers to build more quickly, rather than going through a time consuming Official Plan Amendment. This effort would help get housing supply on stream more quickly, whether affordable or not.
- Allow for cash-in-lieu of Inclusionary Zoning, which would help municipalities lower the administration costs of doing Inclusionary Zoning for smaller redevelopment projects.

Next Steps

Our current housing crisis is extremely complex and cannot be solved by simply pointing to municipal planning processes or by limiting Council and public input. Our priorities do not have to be at odds and supply and affordability do not have to be mutually exclusive. All levels of government, private industry, and the development community must work together to preserve our neighbourhoods and build complete communities.

This HATF report is a starting point and provides a good list of recommendations to help kick start this important conversation. I want to thank the government for taking this issue seriously and committing to taking action. While I appreciate the opportunity to provide feedback to the Taskforce, greater consultation with municipalities, as well as the broader community is needed before any regulatory or legislative changes are introduced. As there was no municipal representation on the Taskforce, I believe it is imperative that you take the time to review the recommendations with municipalities and communities more broadly before taking action. I hope you will consider this before moving any of these recommendations forward.

I remain optimistic, hopeful, and committed to working with all levels of government to make Mississauga and Ontario a more affordable place to live.

Sincerely,

A handwritten signature in black ink that reads "Bonnie Crombie". The signature is written in a cursive, flowing style.

Bonnie Crombie
Mayor, City of Mississauga

Cc. Premier Doug Ford
Hon. Peter Bethlenfalvy, Minister of Finance
Jake Lawrence, Chair, Housing Affordability Task Force
Deepak Anand, MPP
Rudy Cuzzetto, MPP
Natalia Kusendova, MPP
Nina Tangri, MPP
Kaleed Rasheed, MPP
Sheref Sabawy, MPP
Association of Municipalities of Ontario
Ontario Big City Mayors
Federation of Canadian Municipalities
Nando Iannicca, Chair of the Region of Peel

City of Mississauga Corporate Report



Date: February 24, 2022 To: Mayor and Members of Council	Originator's files:
From: Andrew Whittemore, M.U.R.P., Commissioner of Planning & Building	Meeting date: March 2, 2022

Subject

Report of the Ontario Housing Affordability Task Force and Implications for Mississauga

Recommendation

1. That the report titled "Report of the Ontario Housing Affordability Task Force and Implications for Mississauga" from the Commissioner of Planning and Building, dated February 24, 2022, be received for information.
2. That Council endorse positions contained in this report.
3. That the City Clerk forwards this report to the Ministry of Municipal Affairs and Housing; Mississauga's Members of Provincial Parliament, the Association for Municipalities Ontario, and the Region of Peel.

Executive Summary

- On February 8, 2022, the Minister of Municipal Affairs and Housing received a report from Ontario's Housing Affordability Task Force that included 55 recommendations aimed at supporting housing affordability.
- This Corporate Report provides Council with an overview of the Task Force's recommendations; the potential impacts on the City; and, seeks authority to submit comments to the Minister for further consideration.
- The Task Force considers that a lack of housing supply is at the root of Ontario's affordability crisis with all recommendations aimed at bringing 1.5 million houses to market in the next 10 years. The proposed changes touch on many aspects of the planning system, its financing and public participation.
- Overall, Mississauga has demonstrated a strong commitment to affordable housing. However, staff are concerned that many of the Task Force's recommendations may diminish the planning process and quality of life in the city, but fail to deliver affordable housing.

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Background

On December 6, 2021, Steve Clark, Minister of Municipal Affairs and Housing (the Minister) established Ontario's Housing Affordability Task Force (the Task Force). Their mandate is to address housing affordability by increasing the supply of market housing, reducing red tape, accelerating timelines, supporting economic recovery and job creation.

The Task Force is chaired by Jake Lawrence, Chief Executive Officer and Group Head at Scotiabank, with the following eight (8) members:

- Lalit Aggarwal, President at Manor Park Management
- David Amborski, Professor at Ryerson University's School of Urban and Regional Planning
- Julie Di Lorenzo, President at Diamante Urban Corporation
- Andrew Garrett, Senior Principal at Investment Management Corporation of Ontario
- Tim Hudak, Chief Executive Officer of Ontario Real Estate Association
- Justin Marchand, Chief Executive Officer of Ontario Aboriginal Housing Services
- Ene Underwood, Chief Executive Officer of Habitat for Humanity Greater Toronto Area (GTA)
- David Wilkes, President and Chief Executive Officer of the Building Industry and Land Development Association (BILD)

Mississauga's staff and elected officials were invited to meetings by the Task Force, as follows:

- On January 17, 2022, the City's Planning & Building senior leadership provided input on the barriers to development, role of government in overcoming housing barriers while balancing other priorities, and supporting innovative change.
- On January 19, 2022, Premier Doug Ford and the Minister met with big city mayors and regional chairs to discuss the housing crisis at the Provincial-Municipal Housing Summit.

On February 8, 2022, the Task Force delivered its report to the Minister, which includes 55 recommendations. The report is included as Appendix 1. The Minister has not yet indicated which of these recommendations will be supported, nor has a timeline been provided. However, the spirit of the proposed recommendations signal sweeping changes with potential impacts to the City from a financial, community building, public engagement and growth management perspective.

The purpose of this report is to: provide Council with an overview of the Task Force's recommendations; the potential impacts on the City; identify high level areas of support for the recommendations and areas that could be reconsidered; and, seek authority to submit these comments to the Minister for further consideration.

Comments

Overview of Task Force Recommendations

The Task Force considers that a lack of housing supply is at the root of Ontario's affordability crisis with all recommendations aimed at bringing 1.5 million houses to market in the next 10 years. The Task Force is proposing sweeping changes that touch many aspects of the planning system, public participation and growth related charges. The Task Force places a significant portion of responsibility for this housing crisis on slow approvals, outdated zoning, high fees, frivolous appeals and community opposition. The following is a summary of the Task Force themes as presented in their report.

- Theme 1: Make the creation of housing a greater planning priority, require greater density and broadly expand development rights.
- Theme 2: Reduce, shorten and streamline planning application processes and implement province wide zoning and urban design standards.
- Theme 3: Depoliticize the planning process by eliminating restrictive zoning and removing neighbourhood character considerations.
- Theme 4: Fix the Ontario Land Tribunal (OLT) and prevent abuse of the appeals system.
- Theme 5: Support municipalities that commit to transforming the system.

The Task Force's recommendations and the staff response is listed in Appendix 2 for Council's consideration.

Staff Responses and Implications to Mississauga

The City has demonstrated a strong commitment to support provincial aims to create more housing, a greater mix of housing and efforts to make home ownership and renting more affordable. The City further supports the government's commitment to reduce red tape and make it easier to live and do business in Ontario.

Staff have concerns, however, that some of the Task Force's recommendations may remove some decision making powers from Council, reduce community engagement, lower design standards and could undermine the creation of complete communities. Moreover, certain changes could reduce revenues generated by development related charges which could be a risk to infrastructure and parkland provision.

More specifically, most of the Task Force's 55 recommendations, staff either support or are neutral about. Certainly the City has already enacted or is working on implementing many of these actions. However, there are almost 20 actions that staff believe will not contribute to improved housing affordability, but could adversely impact quality of life in the city. Please see Appendix 2 for more detailed information.

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Staff have undertaken a review of the Task Force report and considered the potential implications to Mississauga.

1) Unlimited development rights may not lead to increased housing, or more affordable housing

Many of the Task Force's recommendations are based on a premise that broadly increasing development rights to permit increased heights and densities will lead to more housing being built, which will translate to the creation of more affordable housing. This premise is questionable, and staff have found that developers phase growth in order to manage any downward pressure on unit prices.

City staff note the following for consideration:

- Mississauga staff question the premise that development permissions translate to the development of more housing units.
- The City's Planning and Building Department has approved zoning for 20,000 units, but developers have not yet applied for building permits for these units.¹
- Moreover in 2001, Mississauga pioneered "unlimited height and density" permissions in its Downtown Core. These innovative permissions streamline and bring certainty to the development process, allowing a developer to lift a holding provision and move straight to site plan approvals in this area.
- Mississauga staff estimate that the Downtown Core could readily accommodate a further 50,000 units under this regime. Given there are approximately 10,000 units currently in the development pipeline, lands in the Downtown Core are pre-zoned to accommodate a further 40,000 units (e.g. in addition to the 20,000 units identified).
- Therefore, Mississauga has pre-zoned for at least 60,000 units, but these increased or even unlimited development rights have not resulted in major increases in housing supply or addressed the City's affordability issues.
- There are many reasons why developers may not have built these projects. To name a few, there may be adjacent development completions, challenges securing construction contracts, financial capacity, inflationary pressures leading to increased material and labour costs, or a desire to enshrine development rights for the long term. Affordability is

¹ Notably, over half of these units received zoning approval more than two years ago. In these cases, developers have had ample time to receive site plan approvals and move to the building permit stage.

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also influenced by macro trends, such as low interest rates, the banking system, high levels of housing demand, immigration, etc.

Overall, there are a broad range of issues that impact housing affordability that have not been explored by the Task Force. Certainly in Mississauga's case, development rights (or even unlimited development rights) have not led to significant increases in housing supply or affordability. Any broad changes to development rights on the basis of these recommendations should be carefully considered, as once these development rights are enshrined they will be very difficult to take away.

Suggested City Position	Support	Neutral	Oppose	Mixed Response
Please refer to Task Force Rec # – See Appendix 2	N/A	Rec #38	N/A	Rec # 1-2

2) Municipal planning processes help to address local issues and community safety

The Task Force has several recommendations that seek to reduce decision making timelines, eliminate the need for site plan approvals (in some cases), reduce public meetings and limit appeal rights. All of these recommendations are intended to speed up the planning process.

City staff note the following for consideration:

- *Timelines:* Planning staff and agencies are already challenged by existing timelines. In particular, the Province's own commenting agencies often do not meet the existing deadlines. Any additional shortening of these timelines will further reduce opportunities for municipalities to meaningfully refine applications, and likely further add to OLT caseloads. Notably, Bill 108 almost halved development timelines and in the intervening period there has been no noticeable improvement in affordability.
- *Community Meetings:* Community meetings provide important forums for public input and resolving issues. If these issues are not dealt with at local meetings (or allowed to be dealt with at local meetings), all these matters will then go to Council and will significantly slow down the number of applications that can be heard at each Council meeting, which will in turn slow down the approval processes.
- *Site Plan Processes:* The site plan process also helps to resolve many issues (e.g. resolving issues around fire safety, servicing, etc.). By eliminating site plan processes, these matters will be transferred to the building permit stage. This will slow down the building permit process and put additional pressure on building permit reviewers and inspectors, where planners are trained and experienced at resolving these matters.

- *Incomplete Applications:* Many of the delays are caused by the applicants themselves. Either because a complete application has not been provided or the applicant has not resubmitted information that has been requested. The City's Planning staff provide a lot of support to help educate inexperienced applicants on the planning process. However, applicants could significantly speed up the process by engaging their own experts to help support them through the process, or by promptly responding to requests for further information. To improve quality and ensure completeness of applications, it would be beneficial to require a Registered Professional Planner (RPP) to sign-off on planning reports prior to submission.
- *Community Engagement:* Along with reduced public participation in the planning process, the recommendations also aim to reduce public participation in the appeals process and suggest increasing third party appeal costs, which would make it prohibitively expensive for general members of the public to participate. Staff consider that this overall aim to reduce public participation could prevent the building of trust, transparency and meaningful engagement with residents through the planning process. Community input invariably leads to more context sensitive development proposals and better community outcomes.
- *Premature Appeals:* Again, many reasons for delays at the OLT are a result of applicants not resolving crucial matters. For example, applications are often slowed down at OLT as developers have not resolved key requirements (e.g. servicing) before submitting appeals. It is further noted, that all appeals slow down the planning process as each appeal requires municipalities to dedicate staff and resources that could otherwise be spent expediting applications.

Overall, many of the planning processes that the Task Force claims take up time can in fact be working together to proactively resolve issues with an applicant and potentially save time in the entire process. Again, it is noted that development approvals are only one factor in affordability. Since the mid-1990s Mississauga has allowed unlimited height and density within the Downtown Core. Notwithstanding that services are available and a large percentage of the land is vacant, two decades later the area is still not built out.

Suggested City Position	Support	Neutral	Oppose	Mixed Response
Please refer to Task Force Rec #s – See Appendix 2	Rec # 14, 20, 26	Rec # 27a, 27c, 31	Rec # 8, 9, 13, 18, 19, 27b, 28, 29	Rec # 3b, 15

3) The City is working to reimagine its neighbourhoods

Many of the Task Force's recommendations are focused on increasing development permissions in so called "stable neighbourhoods". Mississauga has been working to realize

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opportunities to reimagine areas in the city that are predominantly comprised of single detached dwellings. The City is supportive of second suites and is in the process of creating more permissive land use planning policies to support growth and change, as well as, reducing parking requirements.

City staff note the following for consideration:

- *Official Plan Review:* The City is reviewing its Official Plan to update policies that support gentle density and infill development, all with input from the community.
- *Increasing Housing Choices in Neighbourhoods:* This Study is examining and testing different housing formats, such as garden suites or garage conversions, as well as, considering a range and mix of housing types and different living arrangements. These efforts will support up to three dwellings on a lot in many of the City's neighbourhoods.
- *Major Transit Station Area Planning:* Staff are actively planning for provincial targets in over 60 MTSA's with over 2,000 hectares of new areas being delineated for intensification as part of this process.
- *Parking Regulations Study:* This Study is reviewing parking standards and reducing them to better align the City's parking rates with current transportation trends, intensification and provide support for affordable housing.

Overall, the Task Force's recommendations are broad "one size fits all" suggestions that propose heights and densities beyond what would be appropriate in many of Mississauga's neighbourhoods, especially those with small lots, narrow roads and unique circumstances. The City is already on the path to reimagine and expand permissions in its neighbourhoods, all while working closely with local communities.

Suggested City Position	Support	Neutral	Oppose	Mixed Response
Please refer to Task Force Rec #s – See Appendix 2	Rec # 5, 6, 7, 20	Rec # 10, 11	Rec # 12a, 12b	Rec # 3a, 15

4) Well designed and complete communities will be crucial for a strong Mississauga

Several of the Task Force's recommendations are intended to streamline and standardize zoning regulations and urban design standards, as well as, eliminate neighbourhood character considerations. There are also recommendations that allow for the conversion or change of use in employment areas or on commercial properties to support high density residential development. Some recommendations also undermine the benefits of planning to support local heritage values.

City staff note the following for consideration:

- *Urban Design:* Urban design helps to support unique, livable and high quality communities. Province-wide guidelines have the potential to greatly hinder creative and innovative urban designs that could maximize and boost the visual appeal of a local neighbourhood. Province-wide guidelines may result in a simple, standardized look that do not allow neighbourhoods to reach their full potential.
- *Supporting Businesses and Commercial Opportunities:* Redeveloping any or all underutilized commercial and industrial properties may be to the detriment of vibrant, local and independently owned businesses and complete communities. Generally, these underutilized commercial and industrial properties are older with affordable rents. This change could increase land values and displace local businesses or cause them to close permanently. Many of these businesses serve existing communities and without some protections, it is very unlikely these businesses would be replaced as part of a redevelopment as it is more profitable for developers to build condominiums.
- *Employment Area Conversions:* Mississauga has provided land and is planning to support more than double the residential growth forecasted by the Province out to 2051, the conversion of further employment areas is not warranted at this time. Moreover, ad hoc employment conversions could impact the viability of employment areas over the long term. This could be problematic in Mississauga as the city contains many Provincially Significant Employment Areas including the Airport Corporate Centre and Airport Operating Area. Notably in 2021, Mississauga was a net importer of about 46,000 employment opportunities and has become one of the most significant growth centres within the Greater Toronto Area.
- *Heritage Protections:* Similarly, when it comes to heritage planning and conservation, the Task Force is dismissive of its value and insinuates that municipalities are adopting underhanded practices. In general, the Task Force's recommendations seem to show a lack of understanding of the process and the protections afforded by Ontario's heritage framework. Moreover, Mississauga uses these tools appropriately to protect and enhance local heritage attributes. There are several examples of property owners in Mississauga's Heritage Districts transforming their properties to include multiple rental units.

Overall, many of these recommendations could undermine the creation of complete communities and could drive up land values to the detriment of local businesses. Single use residential neighbourhoods (without access to shops and services) are ultimately more expensive places to live where residents are forced to drive longer distances to access essentials, all of which can undermine affordability and quality of life.

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Suggested City Position	Support	Neutral	Oppose	Mixed Response
Please refer to Task Force Rec #s – See Appendix 2	Rec # 40	Rec # 17	Rec # 12c, 12d, 16	Rec # 4

5) Mississauga is doing its part to streamline approvals and support development

Several of the Task Force's recommendations seek to modernize the planning process and make greater use of technology and data. Mississauga is working hard to drive towards these types of continuous improvements.

City staff note the following for consideration:

- In 2016, Mississauga implemented ePlans as a web-based solution for applicants to submit applications online through electronic plan submission, review and approval.
- These efforts have streamlined processes with developers and commenting agencies and have worked to expedite approvals, reduce duplication and eliminate the need for paper submissions. In regards to Site Plan applications alone, Mississauga has seen a 24% decrease in total review time and number of review cycles, as well as, a 57% decrease in average processing time for 5 years after implementation. The Province-wide modernization of approvals process with this type of technology would be beneficial to municipalities and applicants.
- In the next month, staff will be recommending that Council implement a streamlined rezoning application process for small developments and delegate the approval authority for Holding Provision Removal applications in accordance with the provisions of Bill 13, *Supporting People and Business Act* - Expanded Delegated Authorities.

Overall, City staff applaud the Province's recent amendments to the *Planning Act* and promoting the sorts of technological upgrades that help modernize planning processes. Certainly in Mississauga's case these efforts have helped to speed up planning processes.

Suggested City Position	Support	Neutral	Oppose	Mixed Response
Please refer to Task Force Rec #s – See Appendix 2	Rec # 20, 22, 24, 45-47, 50, 53, 54	Rec# 43, 51, 52, 55	Rec# 25, 49	Rec # 21, 23

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6) Development related charges are helping to pay for growth and to build our city

The Task Force includes many recommendations that aim to reduce development costs, municipal fees and charges. Municipalities have limited revenue sources, which are mainly property taxes and development charges.

City staff note the following for consideration:

- Mississauga relies on municipal taxes, fees and development charges to annually plan and budget for community services and much needed infrastructure that residents use daily. If growth related charges are reduced, the City will need to make a decision on whether to increase property taxes or reduce the levels of service provided.
- The City does not apply development charges for second units and is currently examining financial and non-financial strategies to reduce costs for affordable rental developments including but not limited to development charge grants, discounted planning fees and reduced parking requirements. The City continues to support waiving fees in tailored ways that have demonstrated reduced costs to provide affordable rental housing.
- City staff also highlight that even if development fees are reduced, the Task Force's recommendations do not offer any safe guards that developers would pass savings onto purchasers. A report prepared by N. Barry Lyon Consultants² stated that developers will price housing at the maximum level the market will support. Any increases/decreases in fees do not affect the sale price of units (the scope of the report was on owned homes and not rental units).
- Waiving development charges will also not work to ensure that housing mix, and "missing middle" housing would be built. Moreover, the waiving of fees does not support affordable housing. Developers tend to build higher end condominiums as they are more profitable and there are no recommendations that address providing more modest housing options.

Suggested City Position	Support	Neutral	Oppose	Mixed Response
Please refer to Task Force Rec #s – See Appendix 2	Rec # 37, 41, 42, 48	Rec# 36, 39	Rec# 32-35, 44	N/A

² N. Barry Lyon Consultants Limited, General Committee Presentation on 2019 Development Costs Review - The Effect of Development-Related Costs on Housing Affordability, (May 1, 2019) – accessed here: https://www7.mississauga.ca/documents/committees/general/2019/2019_05_01_GC_Agenda.pdf

7) Other tools that could empower municipalities and support affordable housing

There are several tools or process changes that the Minister could consider implementing in order to empower municipalities and support affordable housing.

City staff note the following for consideration:

- Develop a mechanism to discourage invest-owner residential real estate and leverage the potential of provincially and federally owned land for affordable housing.
- Apply HST rebates for affordable housing, make revenue tools available to municipalities to raise funds for affordable housing and offer direct funding to municipalities to support middle-income workforce housing.
- Require a Registered Professional Planner (RPP) to sign-off on planning reports prior to submission to speed up applications by improving their quality and completeness.
- Provide municipalities with the power to zone for residential rental tenure so that new multi-residential developments, particularly on large sites or at key strategic locations (transit stations), must include both rental and ownership housing.
- Expand the City's ability to obtain off-site works (such as streetscape and road improvements) from removal of Holding Provision applications, as well as Rezoning and Site Plan applications, which would reduce overall processing time and eliminate the need for additional applications.
- Extend the two year prohibition of new Official Plan Amendment requests from property owners/developers to five years.
- Implement the ability to use zoning expiration regulations (use-it or lose it zoning) to realize the approved-but-not-built backlog units and to more efficiently allocate servicing capacity.
- Allow Conditional Zoning to be used to mandate rental units or to provide an incentive for developers to build more quickly, rather than going through a time consuming Official Plan Amendment. This effort would help get housing supply on stream more quickly, whether affordable or not.
- Allow for cash-in-lieu of Inclusionary Zoning, which would help municipalities lower the administration costs of doing Inclusionary Zoning for smaller redevelopment projects.

Financial Impact

There is no financial impact.

However, if the Province decides to implement any or all 55 of the Task Force's recommendations there could be financial implications. Staff will continue to advise Council on the impacts of any changes stemming from these recommendations, as implementation details become available.

Conclusion

Mississauga has demonstrated a strong commitment to support provincial aims to create more housing, a greater mix of housing and efforts to make home ownership and renting more affordable. The City further supports the government's commitment to reduce red tape and make it easier to live and do business in Ontario.

However, Mississauga staff question the fundamental premise of the Task Force's Report. In that - by broadly expanding development rights, the market will be flooded in units and the price of housing will come down. In Mississauga's experience, having pioneered unlimited development rights, this has not been the case. Developers will phase development in order to reduce downward pressures on unit price.

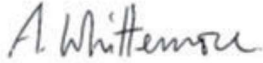
More specifically, staff are also concerned that many of the Task Force's recommendations may reduce municipal autonomy, community engagement, design standards, quality of life and livability. Moreover, some of the Task Force's recommendations could reduce revenues generated by development related charges, which could be a risk to infrastructure and parkland provision.

Overall, the Task Force has provided no evidence for why many of its recommendations would succeed. In Mississauga's experience these recommendations won't contribute to improved housing affordability. It is questionable why so much would be risked and so much given away for so little reward.

Attachments

Appendix 1: Ontario's Housing Affordability Task Force Report

Appendix 2: Housing Affordability Task Force Recommendations, Mississauga's Position in Principle and Staff Comments



Andrew Whitemore, M.U.R.P., Commissioner of Planning & Building

Prepared by: Anna Melikian, Planner, and Katherine Morton, MCIP, RPP, Manager,
City Planning Strategies

#	Recommendation	Mississauga's Position in Principle	Staff Comments
1	Set a goal of building 1.5 million new homes in ten years.	Support/Neutral	<p>The City has zoning in place for 60,000 dwelling units, with planning underway for another 100,000 dwelling units. Although we have seen recent increases, the actual construction of new units has not been keeping pace with development approvals. The City already encourages intensification and growth in built up areas. This goal will support increasing housing options and supply through increased density in the City.</p> <p>This recommendation only addresses housing supply, not the price point of housing.</p>
2	Amend the Planning Act, Provincial Policy Statement, and Growth Plans to set "growth in the full spectrum of housing supply" and "intensification within existing built-up areas" of municipalities as the most important residential housing priorities in the mandate and purpose.	Support/Neutral	Aligns with Official Plan Review, Housing Strategy, Major Transit Station Areas and the City's Increasing Housing Choices in Neighbourhoods Study. The City has existing policies to direct growth to strategic areas and intensify existing built-up areas. The Provincial Policy Statement (PPS) provides provincial policy direction on key land use planning issues that affect communities. In this regard, it requires that municipalities balance competing uses for land. Recent amendments to the PPS and other planning legislation already encourage an increase in the mix and supply of housing and direct growth to built up-areas. To give greater weight to housing supply objectives than say for example, the protection of the environment or ensuring public safety would undermine good planning for current and future generations.
3a	Limit exclusionary zoning in municipalities through binding provincial action: a) Allow "as of right" residential housing up to four units and up to four storeys on a single residential lot.	Support/Oppose	<p>Gentle intensification aligns with Official Plan Review and Increasing Housing Choices in Neighbourhoods. However, there is an underlying assumption that as of right permissions will create affordable housing yet it is not made clear how the new housing units will be made affordable. The impact of this could lead to increased development speculation, causing the price of low density properties to increase even more and ultimately negatively impacting affordability.</p> <p>Broad sweeping changes should be avoided as local planning context is important to manage change. As example, in many neighbourhoods without transit, parking requirements will make it challenging to achieve 4 dwellings per lot. Generally, municipalities should be permitted to determine associated performance zone regulations for intensification (i.e. height of storeys, setbacks, parking requirements, # of units).</p>
3b	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.).	Oppose/Support	<p>Agree. The Ontario Building Code (OBC) needs to be updated to reflect recent building trends, particularly those applying to stacked townhouses. In fact, Mississauga has been facilitating improvements through alternative solutions such as: enhanced, interconnected, early warning systems; standpipe systems; roof top areas of refuge; and sprinklered buildings</p> <p>However, a blanket change without regard to safety as suggested is worrisome. Single egress stairwells is a safety concern for building occupants.</p> <p>The OBC also needs consistent requirements for second units regardless of structure age. Second units in buildings existing before 1996 are not required to meet current safety requirements. Safety requirements should be the same, regardless of structure age.</p>
4	Permit "as of right" conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use.	Support/Oppose	<p>Moderate intensification of greyfield sites is proposed through the current Official Plan Review. However, consideration has to be given to the role of these commercial centres in the community – as they serve as important contributors to complete communities.</p> <p>Permitting a complete conversion of commercial sites to residential without regard to complete mixed communities will negate the concept of the 15 minute City and the notion of building complete communities, as directed by the Growth Plan.</p> <p>Without controls to permit measured changes, this could facilitate incompatibilities between commercial and residential uses (noise/odour).</p>
5	Permit "as of right" secondary suites, garden suites, and laneway houses province-wide.	Support	Secondary suites are already permitted in Mississauga. Mississauga's Increasing Housing Choices in Neighbourhoods is already examining how to permit garden suites, laneway houses, multiplexes as-of-right (up to 3 units/lot) as currently mandated by the Province.
6	Permit "as of right" multi-tenant housing (renting rooms within a dwelling) province-wide.	Support	Mississauga supports home share and other methods of renting out rooms within a dwelling as affordable housing options for students and the workforce. Licensing and inspections of dwellings must still occur to ensure life safety of occupants.
7	Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children.	Support	<p>The Province should require and/or incentivize school boards to develop more urban school models in intensification areas. The current funding model encourages school boards to dispose of schools with low enrollment in mature neighbourhoods and secure similar school facilities through new development.</p> <p>Presupposes adequacy of other municipal infrastructure and community services to accommodate additional density.</p>
8	Allow "as of right" zoning up to unlimited height and unlimited density in the immediate proximity of individual major transit stations within two years if municipal zoning remains	Oppose	<p>Mississauga's experience with unlimited height and density in our Downtown Core has not resulted in affordable housing but has enabled us to meet Provincial Growth targets.</p> <p>Presupposes adequacy of other municipal infrastructure and community services to accommodate additional density.</p>

	insufficient to meet provincial density targets.		May cause heightened land speculation and increased land values within Major Transit Station Area's (MTSAs) and may also result in inappropriate transitions to surrounding lower density development.
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).	Oppose	<p>Broad sweeping changes like this would be very problematic. A bus route in Mississauga is simply not sufficient justification to greatly vary the permitted density and built form. This would significantly jeopardize the capacity of our Neighbourhood Collector streets and lead to significant conflict between pedestrian and vehicles. There is no regard for the cumulative impacts of such a change nor for compatibility with existing neighbourhood context.</p> <p>Removing minimum parking requirements increases municipal maintenance and enforcement costs that may not be fully recoverable. Some minimum parking must be required, such as minimum accessible parking. Mississauga is already proposing reduced parking standards based on level of transit service and precinct.</p> <p>This recommendation may be suited for streets with rapid and higher order transit that require significant public sector investment, but even that would require detailed study to support.</p>
10	Designate or rezone as mixed commercial and residential use all land along transit corridors and redesignate all Residential Apartment to mixed commercial and residential zoning in Toronto.	Neutral	Could be done in some proposed Major Transit Station Areas (MTSAs) but may take some time to implement effectively. Mississauga apartment zones already permit commercial facilities. Most transit corridors within the City permit a mix of commercial and residential uses. Allowing mixed use zones with unlimited height and density (Downtown Core) has not significantly increased the amount of affordable housing. More pre-zoned lands may increase land values, speculation and unreasonable requests for densities higher than can be adequately serviced by the municipality without significant costs. This may result in delays to application processing and will ultimately impact the supply and cost of housing to consumers.
11	Support responsible 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.	Neutral	Not applicable, as Mississauga is mostly built out. The City already has comprehensive planning and responsible housing growth in place for areas such as the Ninth Line lands.
12a	Create a more permissive land use, planning, and approvals system: Repeal or override municipal policies, zoning, or plans that prioritize the preservation of physical character of neighbourhood	Oppose	<p>Heritage protection is very important to all communities and its value should not be less of a priority.</p> <p>In Mississauga, heritage character is embedded in OP policy which allows for a more flexible development process. Additionally, Mississauga's Official Plan Review Bundle 1 policies have started to remove references to "preserving" and "maintaining" neighbourhood character and are now more focused on "context" instead.</p>
12b	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	Oppose	This change would eliminate replacement and small infill developments from site plan approval. While we concur that Mississauga's low density designation needs to become less restrictive, the potential impacts of 10 unit or less development proposals should be considered further. Due to their very nature, intensification projects require scrutiny to ensure compatibility with adjoining lands. The role of site plan approval is to manage how infill occurs. The Committee of Adjustment process relies on site plan approval to address community issues, compatibility, and ensure what was presented is built.
12c	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, and type of materials, window details, etc.) to the Planning Act and reduce or eliminate minimum parking requirements;	Oppose	<p>Introducing Province wide zoning standards is inconsistent with local planning and doesn't take into local context and character.</p> <p>Standardizing specific design requirements (such as Sun/Shadow Studies) has some merit as it will provide some certainty for submission and review requirements to applicants, staff and residents.</p>
12d	d) Remove any floorplate restrictions to allow larger, more efficient high-density towers.	Oppose	This would impact tower separation and sunlight to the public realm. There is no guarantee bigger floor plates make more affordable units. However, larger floor plates do make larger unit layouts thereby increasing the ability to provide 2 and 3 bedrooms units.

13	Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.	Oppose	This would significantly impact the public involvement in the planning process, which typically encourages better development. Community meetings ultimately save time by flushing out community issues and allow for improvements to development proposals. Community meetings saves time at statutory meetings by allowing community input at smaller format, development specific, ward meetings.
14	Require that public consultations provide digital participation options.	Support	Mississauga has implemented digital participation options through the pandemic and will continue to do so. Blended in person/virtual meetings maximize public participation.
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.	Oppose/Neutral	Mississauga has already delegated authority for site plan approval. Since site plan approval was delegated to staff, Council has not rescinded its delegated authority. However, the proposed delegated authority for minor variances is not supported. The proposed delegated authority would not have any significant impact on delivering more affordable housing. The COA process provides autonomy from elected officials and planning staff.
16	Prevent abuse of the heritage preservation and designation process by: 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	Oppose	Mississauga's heritage planning committee does not abuse its authority. In fact, the unique character offered in Mississauga's Heritage Districts and Cultural Heritage Landscapes provide opportunities for affordable housing in desirable areas. Several property owners in our Heritage Conservation Districts (HCD) are transforming properties to include multiple rental units. The City is undertaking a Cultural Heritage Landscape (CHL) Inventory Review focused on conserving the character of neighbourhoods as they evolve and increase in density. This new strategy allows for a more flexible development process. Heritage is bringing a very permissive approach to approvals and seeks to balance the desire to provide affordable housing while conserving heritage. Elimination of character policies would eliminate HCDs and CHLs and remove the desirability and attraction of these neighbourhoods for residents.
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.	Neutral	Heritage property value has been a key focus of Heritage Planning as the City works through its affordable housing strategies. Studies have proven that heritage properties increase in value over time after designation. The City further supports heritage property owners through a Heritage Property Grants program, which continues a record of success year after year. Heritage property value does not impede affordable housing. Heritage properties can be integrated into modern developments to add space for affordable housing and provide continuity in a community. Several heritage buildings have been successfully modified into multiple unit dwellings and serve as incubators for affordable housing.
18	Restore the right of developers to appeal Official Plans and Municipal Comprehensive Reviews.	Oppose	This will most likely delay implementation of affordable housing. City's priorities would remain the same but restoring the right of developers to appeal Official Plan and Municipal Comprehensive Review (MCR) processes will lead to lengthy appeal periods and delay implementing updated policies and zoning. Lengthy appeals take time and resources away from other City planning priorities and processing development applications. This recommendation will have negative impacts and contradicts the Task Force's narrative to make processes quicker. Developers will have the right to appeal City policies which are largely intended to implement provincial legislation and mandates. If developers continue to assume they can secure additional density and/or units after a MCR, they will factor this potential value into their pro-forma analysis after overpaying for land.
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.	Oppose	Mississauga's statistics typically show that applications spend longer with applicants than they do with City for review. Do not support automatic approval of applications as many are incomplete, incorrect or contain conflicting information. Support legislative timelines for provincial review process.
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	Support	Provincial facilitators for provincial ministries/agencies could be helpful to resolve issues/conflicts.
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	Support/ Oppose	This is supported, and already operationalized, from a development planning perspective. Developers are required to attend DARC (Development Application Review Committee) meeting, where relevant Departments and outside agencies provide complete application requirements (plans, studies, etc.) Additionally, stamped engineering drawings and sometimes letter of reliance are accepted. However, while binding prescriptive requirements to define what constitutes a complete application would mitigate applicant uncertainty, establish uniformity for building permit submission requirements, in the absence of legislated amendments to 'joint and several' liability and 'duty of care' requirements for municipalities, the receipt of certification from a regulated professional, would not protect municipalities from being exposed to liability.

	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.		Even with an Engineer's stamp absolving the Municipality of responsibility, a review of the application is still required to issue a permit.
22	Simplify planning legislation and policy documents	Support	Planning Act legislation could be clearer. Suggest that Province create an advisory group of municipal/consulting planners/lawyers to review and recommend changes.
23	Create a common, province-wide definition of plan of subdivision and standard set of conditions which clarify which may be included; require the use of standard province-wide legal agreements and, where feasible, plans of subdivision.	Support/Neutral	Most municipalities have a standard set of subdivision conditions and agreements. Limited benefit from standardizing these province wide. Many conditions of draft plan approval are specific to the development. It would take a long time to coordinate requirements among all municipalities (similar to trying to standardize zoning across the province).
24	Allow wood construction of up to 12 storeys.	Support	Mississauga supports what the Ontario Building Code (OBC) allows. This will be in the National Building Code in the updates this year and most likely in the next version of the OBC.
25	Require municipalities to provide the option of pay on demand surety bonds and letters of credit.	Oppose	Currently, the Ontario Building Code Act's conditional building permit provision allows applicants to provide security for the removal of commenced building and restoration of site and does not restrict the Chief Building Officer from accepting 'Pay On Demand Bond' instead of 'Letter of Credit'. Mississauga staff have previously investigated the merits of accepting surety bonds in place of a traditional letters of credit that are required under the City's subdivision site servicing agreements. Research, along with Legal and Banking Industry advice, concluded that surety bonds represent a financial risk to the City. A letter of credit provides the best mechanism to ensure that the municipality will receive its money if a builder defaults in performing its obligations.
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	Support	Could possibly reduce or expedite Ontario Land Tribunal (OLT) appeals involving affordable housing leading to earlier development. The legislation will need to clarify the precise standard of review to be used by the OLT in determining (up front) if an appeal has merit.
27a	Prevent abuse of process: a) Remove right of appeal for projects with at least 30% affordable housing in which units are guaranteed affordable for at least 40 years.	Neutral	Developers may initially propose 30% affordable housing only to revise the proposal later on, simply to remove the right of appeal. Mississauga would be supportive of limiting appeal rights where there's a guarantee of housing units below average market rate.
27b	Require a \$10,000 filing fee for third-party appeals.	Oppose	For landowners seeking to launch a third party appeal, this would create a significant financial obstacle with a \$10,000 filing fee.
27c	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.	Neutral	Mississauga has no comments.
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.	Oppose	The planning appeal process would be less transparent and accountable as few individuals would be made aware of oral decisions. Oral decisions typically do not contain well thought out reasons; even fewer individuals would be aware/informed of the outcome if other recommendations in the Report are taken into consideration to limit third party appeals/public participation in appeal process. Could accelerate timing and decrease delay. In lieu of oral decisions, the better approach is to reform the manner in which Ontario Land Tribunal (OLT) functions (including addressing its resource needs) so that the responsibility will be with OLT to issue written decisions promptly, within a defined period of time.
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	Oppose	Will create unreasonable and unrealistic pressures to process planning applications, compelling decision-making to occur prematurely. The award of punitive damages may negatively impact the City's financial and resource capacity limits, which could lead to an increase in planning fees to address the attendant consequences; an increase in fees would negatively impact the financial viability of affordable housing projects.

	punitive damages.		This will carry a significant impact as the proposal is not simply that costs be awarded against a municipality, but that the Ontario Land Tribunal (OLT) order payment of punitive damages. Punitive damages could be hefty and significantly exceed a costs award. Further, it appears that the recommendation contemplates OLT could order both costs against a municipality as well as payment of punitive damages.
30	Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets	Support/Neutral	<p>Funding to increase Ontario Land Tribunal (OLT) staffing for quicker outcomes via hearing or mediation will allow disputes to be resolved more quickly, and reduce/mitigate delay and uncertainty with respect to City-led initiatives.</p> <p>To the extent that City policy initiatives and/or development applications that provide affordable housing are appealed, more funding could lead to faster approvals/ resolution of appeals to allow those initiatives or projects to move forward.</p> <p>Timeliness and efficiency of the adjudicative system would benefit all stakeholders. In addition, attracting Members with strong credentials, both technical and mediation, would provide greater comfort in terms of the quality of the process and its outcomes.</p>
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.	Neutral	<p>If any of Mississauga's appeals qualify as being part of the Tribunal's existing backlog, then their prioritization could provide certainty and clarity about Mississauga's Affordable Housing vision for these areas; however, no development applications have been filed for these sites.</p> <p>Priority should be given to municipal initiated amendments that are appealed in addition to development applications.</p> <p>It is unclear how the Tribunal would be equipped to decide which applications should be "fast-tracked" over others. Most applications "support housing growth and intensification". There may be some procedural unfairness to some applicants and/or municipalities whose projects or initiatives are stalled.</p>
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.	Oppose	<p>Waiving Cash-in-lieu (CIL) on all small projects would reduce overall CIL collections, reduce the reserve fund balance over time and therefore limit the City's ability to deliver parkland through direct acquisition. For example, in a development of exclusive detached homes, waiving CIL for 10 of those homes will not make them affordable.</p> <p>Waiving CIL for any development where no new material infrastructure will be required is problematic in that CIL is currently collected and spent on a City wide basis. Even if there is no immediate parkland need in the area of the new development, the increased population resulting from that development would benefit from parkland provided elsewhere in the City for purposes of destination parks and facilities, environmental factors and city wide trail system connections. The park system as a whole and not just the local park infrastructure benefits all new residents.</p>
33	Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years	Oppose	Waiving Development Charges (DCs) would either impact the City's capital program or create additional pressure on the tax base. Costs need to be recovered from somewhere.
34	Prohibit interest rates on development charges higher than a municipality's borrowing rate	Oppose	City's view is that deferral agreements are not "borrowing" they are advancing the point in time for which the charge applies, having a higher rate attributes to "inflation" costs to recover the lost revenue (right now the City allocates \$1.4M annually through tax to recover the deferred interest). The legislation currently allows for a municipality to charge "interest" with no specified cap.
35	Regarding cash in lieu of parkland, s.37, Community Benefit Charges, and development charges: 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.	Oppose	<p>An annual review of Cash In Lieu (CIL) reserve funds does not make sense given that land acquisition for parkland purposes is largely based on opportunity and/or negotiations with the applicable land owner. Lands that are suitable for park purposes in the area of need are not always available. Negotiations and successful acquisitions can sometimes take years.</p> <p>Furthermore, lands that are in our highest area of need are often high value requiring collecting and saving CIL over a period of time prior to having sufficient funds to purchase. Area specific collection and spending limits our ability to purchase lands in areas of greatest need.</p> <p>Mississauga could support annual reporting of reserve fund spending provided that reporting also include the ability to earmark funds for future anticipated purchases.</p>

36	Recommend that the federal government and provincial governments update 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 clawback.	Neutral	Mississauga has no comment.
37	Align property taxes for purpose-built rental with those of condos and low-rise homes	Support	Mississauga has the same tax rate for both Residential and New Multi-Residential categories (includes new rental). Support this recommendation to encourage construction of new rental units.
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	Neutral	<p>The Planning Act prohibits leases in Ontario from having a term longer than 21 years (including potential extensions/renewals) unless such a lease falls within one of the specifically-stated exemptions. If a lease has a term (including extensions/renewals) of 21 years or more and does not fall within any of the stated exceptions in Section 50 of the Planning Act, the lease may be in contravention of Section 50 and could potentially be void unless consent is obtained pursuant to Section 53.</p> <p>Extending the maximum period for land leases may facilitate some forms of affordable housing development (e.g. Community Land Trusts).</p> <p>Could allow for the extension of restrictive covenants requiring affordable housing beyond the current limit to 40 or more years.</p>
39	Eliminate or reduce tax disincentives to housing growth.	Neutral	More information is required to fully address this recommendation. All tax could be considered a tax "disincentives" so what does this actually include?
40	Call on the Federal Government to implement an Urban, Rural and Northern Indigenous Housing Strategy	Support	Mississauga supports this recommendation.
41	Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.	Support	<p>This is a Regional responsibility. The Region of Peel is providing a one-time grant of \$2.5 million to BlackNorth to support affordable housing for Black Peel residents. Through this grant, 50 eligible Peel households are expected to secure assistance under the BlackNorth Home Ownership Bridge Program.</p> <p>The Province should provide funding for other affordable housing pilot projects for marginalized households in order to support marginalized households and new comers.</p>
42	Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects	Support	The need for loan guarantees has been consistently identified as an issue for purpose-built rental and non-profit housing development.
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.	Neutral	<p>This is partially a Regional responsibility. This recommendation does not align with the City's financial planning practices. Projects are initiated when enough funds have been collected to attribute to a project, which could take years. As well, in many cases, multiple developments/projects are reliant on the infrastructure being built. Penalizing one development may ultimately have consequences for other development projects.</p> <p>The municipality does not typically provide services to a new community until the development happens (e.g. fire stations, community centres, libraries). A 10-year planning horizon for municipal infrastructure is necessary.</p>
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	Oppose	<p>This approach is contrary to "growth pays for growth" concept. In this situation, the costs of growth would be distributed to all users, not just the new users. Existing residents have all ready paid for their infrastructure.</p> <p>Water and waste water are Regional services.</p>
45	Improve funding for colleges, trade schools, and apprenticeships; encourage and incentivize municipalities, unions and employers to provide more on-the-job training	Support	<p>City of Mississauga's Economic Development Office (EDO) works with different institutions that provide skilled trades training locally i.e. Sheridan College, Centennial College (where EDO sits on a Program Advisory Committee for a manufacturing program) and promotes their programs and graduates to local employers.</p> <p>More skilled workers brought into Mississauga, especially if they are electricians, plumbers, millwrights would provide much needed support to</p>

			construction projects that are already facing a shortage of workers and delays in completion.
			Increasing the talent pool of skilled trades people will, in theory, help to ensure that projects are completed in a timelier manner.
46	Undertake multi-stakeholder education program to promote skilled trades.	Support	City of Mississauga's Economic Development Office (EDO) is promoting advanced manufacturing and the skilled trades to under-represented groups in the trades, including the Women in Mississauga Manufacturing Initiative. As part of this initiative, EDO is also providing strategic direction to employers in their recruitment of women for skilled trades roles.
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.	Support	The Mississauga Economic Development Office (EDO) acts as a referral partner for the Federal Government's Global Skills Strategy Program. This would include National Occupational Classification (NOC) B Technical jobs and skilled trades. EDO has also connected Federal Government immigration representatives with our Mississauga manufacturers looking to hire skilled trades people from outside Canada.
48	The Ontario government should establish a large "Ontario Housing Delivery Fund" and encourage the federal government to match funding. This fund should reward: a) Annual housing growth that meets or exceeds provincial targets b) Reductions in total approval times for new housing c) The speedy removal of exclusionary zoning practices	Support	Support in principle but more information is required to make an informed decision. The City welcomes a subsidy from the Province to facilitate more affordable housing.
49	Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.	Oppose	Housing is market driven, it would not be realistic to penalize a municipality when the decision to build rest with a private developer. As indicated previously, the City has 20,000 approved but unbuilt dwelling units and cannot control when those units will be constructed.
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.	Support	Mississauga already utilizes an e-permitting system. Mississauga's ePlans is an end to end online/digital application submission, review and approval system that has been in place since 2016. A Provincially funded e-permitting system would ensure consistency amongst municipalities and provincial government agencies, and would provide smaller municipalities that don't have the capacity to make to make such change an equal opportunity to modernize. The City would like to ensure that any standard system could still be adapted to City processes to ensure maximum efficiency for application processing. Mississauga currently makes data public via Open Data. Common data would further encourage consistency.
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.	Neutral	Relying solely on Ministry of Finance (MOF) population projections will likely have higher estimates, which are not informed by Growth Plan policies (e.g. do not consider achieving density targets). The impact would be loss of municipal autonomy over decision making. However, it would provide more standardized data and reporting. Clarity required on whether the Task Force has considered implications of relying only on provincial population projections. The Task Force should consider using population projections that are informed by Growth Plan policies.
52	Resume reporting on housing data and require consistent municipal reporting, enforcing compliance as a requirement for accessing programs under the Ontario Housing Delivery	Neutral	Mississauga currently reports to the Province (MMHA) through data on building permits and other approvals, as well as, Financial Information Return data, which is the main data collection tool used by the Ministry of Municipal Affairs and Housing to collect financial and statistical information on municipalities.

	Fund		
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.	Support	This is currently being conducted by the Region of Peel through its role as Housing Service Manager and upper municipal tier. Any reporting on the gap between supply and demand should include income information and ability to pay for market units by municipality and by dwelling type.
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.	Support	Mississauga supports the creation of an all government committee to focus on delivering affordable housing.
55	Commit to evaluate these recommendations for the next three years with public reporting on progress.	Neutral	Mississauga does not agree with several of the recommendations, and does not see value in reviewing and monitoring these. However, a coordinated review and monitoring of housing data is important.
Appendix A - Affordable Housing	<p>Call upon the federal government to provide equitable affordable housing funding to Ontario.</p> <p>Develop and legislate a clear, province-wide definition of "affordable housing" to create certainty and predictability.</p> <p>Create an Affordable Housing Trust from a portion of Land Transfer Tax Revenue (i.e., the windfall resulting from property price appreciation) to be used in partnership with developers, non-profits, and municipalities in the creation of more affordable housing units. This Trust should create incentives for projects serving and brought forward by Black- and Indigenous-led developers and marginalized groups.</p> <p>Amend legislation to:</p> <ul style="list-style-type: none"> • Allow cash-in-lieu payments for Inclusive Zoning units at the discretion of the municipality. Require that municipalities utilize density bonusing or other incentives in all Inclusionary Zoning and Affordable Housing policies that apply to market housing. • Permit municipalities that have not passed Inclusionary Zoning policies to offer incentives and bonuses for affordable housing units. • Encourage government to closely monitor the effectiveness of 	Support	<p>Most of the proposed recommendations in this section align with Mississauga's Housing Strategy and work currently underway to implement Inclusionary Zoning (IZ). As the report notes, all sectors are required to contribute to the provision of housing supply including affordable housing.</p> <p>IZ is being developed according to Provincially mandated regulations which take into consideration market impact. The City will phase in IZ to allow the market to adjust to this new cost. Consideration for off-sets could be made for development which goes beyond the minimum requirements in terms of number of units or affordability depth and duration. The City has advocated for the ability to secure Cash-in-lieu of Affordable Housing units where IZ results in few units.</p> <p>IZ is only one tool that municipalities can use to secure affordable housing where new transit infrastructure investment has occurred. The City is considering other strategies e.g. tax-funded grants and new revenue sources (e.g. vacancy tax to reduce costs for affordable housing producers). The Province may wish to provide developers who contribute IZ units with tax credits.</p>

	<p>Inclusionary Zoning policy in creating new affordable housing and to explore alternative funding methods that are predictable, consistent and transparent as a more viable alternative option to Inclusionary Zoning policies in the provision of affordable housing.</p> <ul style="list-style-type: none"> • Rebate MPAC market rate property tax assessment on below-market affordable homes. • Encourage government to closely monitor the effectiveness of Inclusionary Zoning policy in creating new affordable housing and to explore alternative funding methods that are predictable, consistent and transparent as a more viable alternative option to Inclusionary Zoning policies in the provision of affordable housing. 		
Appendix C - Government Surplus Land	<p>Review surplus lands and accelerate the sale and development through RFP of surplus government land and surrounding land by provincially pre-zoning for density, affordable housing, and mixed or residential use. All future government land sales, whether commercial or residential, should have an affordable housing component of at least 20%. Purposefully upzone underdeveloped or underutilized Crown property (e.g., LCBO). Sell Crown land and reoccupy as a tenant in a higher density building or relocate services outside of major population centres where land is considerably less expensive. The policy priority of adding to the housing supply, including affordable units, should be reflected in the way surplus land is offered for sale, allowing bidders to structure their proposals accordingly.</p>	Support	<p>The scarcity of land at a reasonable cost is one of the key barriers to Affordable Housing. Government land is publicly-owned land and its disposal should achieve key societal objectives in addition to generating revenue.</p> <p>There is potential to make a significant contribution to affordable housing as new residential development takes place.</p> <p>A significant component of affordable housing (min 20%) is supported particularly where a Ministerial Zoning Order or pre-zoning has been applied. These proactive measures reduce risk and cost for developers which can make affordable housing more achievable.</p> <p>The Province through its various agencies (e.g. Infrastructure Ontario, Metrolinx) should implement this rule for the disposal of crown land with a minimum size.</p>