



March 17, 2022

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

Dear Minister Clark:

**Re. The Ontario Task Force on Housing Affordability
Report Recommendations**

The Federation of Citizens Associations (FCA), representing 74 community groups in the City of Ottawa, and its members are often involved in planning matters, as it affects the neighbourhoods our residents live in and the taxes they pay. These are not trivial matters. Planning decisions have quality-of-life implications for our residents as well as for practical issues such as parking, parkland, municipal services, and taxes. While we can appreciate the goal of the Ontario Task Force on Housing Affordability to facilitate the development of affordable housing in Ontario, we have serious concerns regarding some of the 55 recommendations that the Task Force makes.

Specifically, our concerns are:

The section of the Task Force report *Focus on getting more homes built* proposes development “as of right” of residential housing up to 4 units and up to 4 storeys on a single residential lot (rec. #3) and multi-tenant housing province-wide (rec. #6). These recommendations fail to recognize that such open-ended language ignores the need to balance such development with appropriate infrastructure, including not only hard services but greenspace, tree canopy, access to services, etc. The object should be to build communities, not just houses. As the City of Ottawa in its response to the Task Force recommendations rightly notes, permitting 4 dwellings units and up to 4 storeys on every residential lot may be appropriate in some instances but not in others. Simply put: one size does not fit all. The FCA opposes these recommendations.

Similarly in the Task Force section *Align investments in roads and transit with growth* while the FCA supports higher densification in the immediate proximity of major transit stations the recommendation for unlimited height and unlimited density (rec. #8) ignores

local context that should contribute to the appropriate planning decision. A province-wide approach is inappropriate – Ottawa is not Toronto, nor is it Kingston or Owen Sound.

As well, the proposal to allow “as of right” zoning of 6 to 11 storeys on **any** street utilized by public transit (rec. #9) is far too broad: what might be reasonable on arterials with high-frequency transit is not on residential streets with half-hour bus service.

As well, the FCA strongly opposes recommendation 11 for open development outside of existing municipal boundaries. Such development contributes to urban sprawl, which is costly to both taxpayers and the environment.

In the Task Force section *Start saying “yes in my backyard”*, the FCA opposes repealing or over-riding zoning that preserves the physical character of a neighbourhood (rec. #12a). When people buy homes they are also buying into a neighbourhood with all its physical characteristics. While neighbourhoods can (and do change) through controlled intensification, such characteristics as tree canopy, streetscape and compatible building forms ought to form part of the zoning for that neighbourhood. Contrary to the Task Force report, the choice is not binary between NIMBY and YIMBY but is more nuanced, requiring local decision-making, not a uniform (read: provincial) approach.

Consistent with this is the FCA opposition to the imposition of province-wide zoning standards (rec. #12c) as this ignores local context which contributes to neighbourhood attractiveness and quality of life.

Removing floorplate restrictions for high-density towers (rec. #12d) means removing guarantees for those tower residents to have access to surrounding greenspace on site as well as ignoring the impact of the design of such towers on neighbouring residents. The use of cash-in-lieu of parkland is to compensate where providing such greenspace is not feasible.

The Task Force proposes limiting public meetings on development proposals to the legislated minimum (rec. #13). This ignores the proven value of public consultation that leads to modifications that developers have accepted and in turn better acceptance of development proposals by the public. The FCA opposes this Task Force recommendation.

The Task Force errs in characterizing the heritage designation process as “abuse” (rec. #16). Heritage designations do not stop, and are not meant to stop, new development, but to guide it. The FCA believes heritage conservation is important in preserving historical context in a community and is aware of many examples where redevelopment has occurred successfully in these circumstances. Further, the notion that municipalities should compensate property owners for loss of property values as a result of heritage designations (rec. #17) is both unreasonable and untenable. In our view these recommendations counter the provincial interest in heritage conservation (Provincial Policy Statement, Section 2.6).

The FCA opposes unilaterally restoring the right of developers to appeal municipal Official Plans to the Ontario Land Tribunal (rec. #18) – why only developers? Further, such a retrograde step removes local accountability and adds more delay to the planning approval process – an objective the Task Force avowedly sought to mitigate.

In the Task Force section *Cut the red tape so we can build faster and reduce costs*, it is clear that the developer bias in this Task Force is showing. “Red tape” is the process by which the public interest is protected, by requiring the appropriate studies to support a planning application, and ensuring due process. While cutting “red tape” may serve the developer, it does not always serve the public. On this basis the FCA opposes recommendation 19. As well, the “approvals facilitators” the Task Force proposes (rec. #20) to ensure application timelines are met should also have the responsibility to ensure that the public have ready and timely access to the details and studies for the application involved – in other words, ensure a level playing field.

In the Task Force section *Prevent abuse of the appeal process*, the FCA believes it is appropriate to demonstrate reasonable grounds for an appeal of a planning decision to the Ontario Land Tribunal without the requirement of providing expert reports (rec. #26). Requiring expert reports would un-necessarily delay the planning process and would pre-empt the appeal process. As well, removing the right of appeal for any project with at least 30% of the units being “affordable” for 40 years (rec. #27a) ignores any consideration for other important planning issues related to the project, such as municipal servicing, tree canopy, access to greenspace, etc.

The Task Force proposal to require a \$10,000 filing fee for third party appeals (rec. #27b) is egregious and must be strongly opposed. As a practical matter this only permits appeals by the wealthy and is inherently unjust. The Task Force recommendation 26 already requires the demonstration of reasonable grounds for appeal.

In the Task Force section *Reduce the costs to build, buy and rent*, the proposal to waive development charges and parkland cash-in-lieu for all infill residential projects up to 10 units (rec. #32) is opposed by the FCA. There has to be a compensatory increase in municipal services and parkland amenities as new housing units are added to an existing neighbourhood, and the cost of this should not be borne solely by the existing taxpayers.

The FCA has no comments to make on the remaining Task Force report sections.

In conclusion, the FCA is disappointed that the Ontario Task Force on Housing Affordability did not spend time on the demand side of the housing equation, particularly for low-income families who do not qualify for social (rent-geared-to-income) housing and will not be able to buy a home. Access to suitable housing is a key social determinant of health and allows people to participate fully in their community. In our view the Ontario Task Force on Housing Affordability only addressed half the problem, and not well at that.

Yours truly,

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

Alex Cullen
President FCA

Cc Ottawa-area MPPs
Mayor, City of Ottawa
Federation of Urban Neighbourhoods