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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