



HOUSING SUPPLY CONSULTATION SUBMISSION TO MINISTRY OF MUNICIPAL AFFAIRS AND HOUSING EXECUTIVE SUMMARY FEB. 4, 2019

The Housing Supply Consultation document appears to start from the premise, one frequently expressed by the private sector, that the housing supply issues may largely be blamed on government “red tape”, and difficulties in delivering housing as being snarled in delays and confusion. If you view the amount of development activity under way in Toronto, it is incomprehensible to state that our current progress is “too slow”. Thousands of units are currently being held up due to the LPAT transition date delay. It's even more incomprehensible when you factor in the lack of public investment in infrastructure, transportation, schooling, community services, etc. It is utterly ridiculous to attempt to “reduce red tape” without addressing the need to increase investment in public infrastructure.

The planning process rightly and clearly recognizes the need/benefit of consultation amongst the 'triangle' of industry, public agencies AND the public. When a proposal meets resistance, resulting in time delays, generally the problem is a lack of consensus by the triangle and that a best-result solution is still to be achieved. The best decisions are those that have been pre-scripted by the triangle of interests and simply confirmed by City Council.

When a resolution cannot be reached, the process waits to be addressed on some future date, what is effectively already day-old bread. The appeal tribunal's mediation is somewhat restricted to considering “quick tricks” and is unable to reframe the question at hand; resolving the underlying issues takes time. Almost all projects are much improved through the iterative process, and many developers do not object to this process and often welcome another set of eyes. Frequently, they are not strongly opposed to the timelines, due to their not being ready for other reasons, such as financing, internal resourcing, market timing, etc.

We also note further issues with the development industry's statements.

1. Supply of land ready for development – Development industry's position that more is needed is countered by independent studies – Neptis and Victor Doyle – saying there is plenty.
2. Inability of up-zoning to address housing affordability -- Richard Florida in his recently published book *The New Urban Crisis* argues that “although it is important to combat unnecessarily restrictive zoning and building codes (whose advocates he dubbed “New Urban Luddites”), easing these codes would do little to address housing affordability and might actually serve to increase housing prices in the neighbourhoods in question, for the simple reason that developers would use the land not for affordable units but for luxury construction”.