



# COMMUNICATION UPDATE

<b>TO:</b>	Mayor and Members City Council
<b>DATE:</b>	October 20, 2023
<b>SUBJECT:</b>	Mayor Horwath's Response to the Honourable Paul Calandra, Minister of Municipal Affairs and Housing, Affordability Task Force's Recommendations and Ranking Chart (City Wide)
<b>WARD(S) AFFECTED:</b>	City Wide
<b>SUBMITTED BY:</b>	Anita Fabac Acting Director, Planning and Chief Planner Planning and Economic Development Department
<b>SIGNATURE:</b>	

The purpose of this Communication Update is to provide Council with an update on the Mayor's response to the Province's Housing Affordability Task Force's Recommendations and Ranking Chart.

On September 15, 2023, the Honourable Paul Calandra, Minister of Municipal Affairs and Housing, requested the Mayor's position with respect to the 74 Task Force Recommendations and the City's ranking of the five initiatives the City believes would have the most impact in creating additional housing. The Province requested this information be provided by no later than October 16, 2023. The request from the Province also noted that failing to return the completed chart by October 16, 2023 would disqualify the City from being eligible for the Province's new \$1.2 billion Building Faster Fund that was announced at the Association of Municipalities of Ontario conference in August 2023.

The Mayor's letter is attached as Appendix "A" and the completed chart is attached as Appendix "B". The Planning Division supported the Mayor's office with completing the chart.

## Background

In February 2022, the Housing Affordability Task Force delivered its final report with recommendations to help Ontario tackle the housing supply crisis and build at least 1.5 million homes by 2031. The Task Force made 74 unique recommendations. Twenty-

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OUR Vision: To be the best place to raise a child and age successfully.

OUR Mission: To provide high quality cost conscious public services that contribute to a healthy, safe and prosperous community, in a sustainable manner.

OUR Culture: Collective Ownership, Steadfast Integrity, Courageous Change, Sensational Service, Engaged Empowered Employees.

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three (23) recommendations have been implemented to date. The Province wants to move forward implementing further recommendations from the Task Force's report and therefore requested input on priorities from the City relative to the Task Force's report recommendations and comments on the other recommendations.

The City has provided feedback on the Province's proposed policy and legislative changes to build more homes faster such as commenting on the Housing Affordability Task Force Recommendations in March of 2022 (PED22071) and support for the Municipal Housing Pledge (PED23056).

In commenting initially on the Housing Affordability Task Force's recommendations, the City of Hamilton agreed with the overall intent of the Task Force's Report to:

- Make policy changes to prioritize growth and to allow for greater density and intensification while providing a variety of housing types;
- Investigate opportunities to reduce and streamline application processes;
- Prevent abuse of the appeal process, in particular non-decision appeals, and ensure effective case management by the Ontario Land Tribunal;
- Align efforts between all levels of government to incentivize more housing; and,
- Encourage and support more funding opportunities to both modernize technologies to improve our intake/review of applications, and to deliver the necessary municipal infrastructure (both "hard" and "soft") and services that growth requires.

Several of the Housing Affordability Task Force's recommendations have already been implemented at the Provincial and/or Municipal level. Of the remaining recommendations, the five initiatives the City believes would have the most impact in creating additional housing focus on:

- Reducing unnecessary OLT appeals would allow municipalities to focus resources on actual development applications, thereby significantly improving approval timelines (Action 26);
- Increasing the supply of new purpose built rental housing units to stabilize rapidly increasing rental rates through the provision of provincial and federal loan guarantees (Action 42);
- Creating an Affordable Housing Trust from a portion of Land Transfer Tax Revenue to in part develop/create incentives for projects serving and brought forward by Black- and Indigenous-led developers and marginalized groups (Action B-3);
- Enabling municipalities to withdraw infrastructure allocations from any permitted projects where construction has not been initiated to encourage the construction of permitted projects in a timely manner (Action 43); and,

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- Improving funding and undertake multi-stakeholder consultation to increase the supply of skilled trades vitally necessary to build more homes faster (Action 45).

### **Next Steps**

Planning staff will continue to monitor the Province's next steps. The Mayor has notified the Province that the City of Hamilton looks forward to working with the Province to secure funds under the Province's new \$1.2 billion Building Faster Fund and to working together to help address the crisis of affordability in the City.

If you require any further information on the above matter, please contact Anita Fabac, Acting Director of Planning and Chief Planner by email at [Anita.Fabac@hamilton.ca](mailto:Anita.Fabac@hamilton.ca) or at (905) 546-2424 Ext. 1258, or, Charlie Toman, Program Lead – Policy Planning & Municipal Comprehensive Review by e-mail at [Charlie.Toman@hamilton.ca](mailto:Charlie.Toman@hamilton.ca) or at (905) 546-2424 Ext. 5863.

### **APPENDICES AND SCHEDULES ATTACHED**

Appendix "A" - Mayor's Response Letter

Appendix "B" - Ranking Chart



OFFICE OF THE MAYOR  
CITY OF HAMILTON

VIA: Email

The Honourable Paul Calandra  
Minister of Municipal Affairs and Housing  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto ON, M7A 2J3

October 11, 2023

**Re: Housing Affordability Task Force's Recommendations and Ranking Chart**

Dear Hon. Minister Calandra,

Please find attached the City of Hamilton's response to your request of Sept 15, 2023. We have provided our position on each of the 74 Task Force recommendations and provided our ranking of the five initiatives we believe would have the most impact in creating additional housing in Hamilton.

Thank you for your efforts in understanding the municipal perspective on these important issues.

The City of Hamilton looks forward to securing funds under the Province's new \$1.2 billion Building Faster Fund that was announced at the Association of Municipalities of Ontario conference in August, and to working together to help address the crisis of affordability in our city.

Please let me know if we can be of any further assistance and I look forward to our continued collaboration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrea Horwath".

Mayor Andrea Horwath

cc: Hon. Rob Flack, Associate Minister of Housing  
Kirstin Jensen, Interim Chief of Staff, Minister's Office  
Martha Greenberg, Deputy Minister  
Joshua Paul, Assistant Deputy Minister, Market Housing Division  
Sean Fraser, Assistant Deputy Minister, Planning and Growth Division  
Caspar Hall, Assistant Deputy Minister, Local Government Division

Attachment:

10-11-2023 City of Hamilton Response to HAFT Recommendations

**Attachment: List of 74 Housing Affordability Task Force (HATF) Recommendations for Response**

<b>Please identify the top 5 HATF recommendations that you support, and rationale / comments</b>	
1.	26) Require appellants to promptly seek permission ("leave to appeal") of the OLT and demonstrate that an appeal has merit, relying on evidence and expert reports, before it is accepted." This should include requirement to demonstrate insufficiency of existing permissions in cases where an applicant is appealing a recently-approved Secondary Plan. Reducing unnecessary appeals would allow municipalities to focus resources on actual development applications, thereby significantly improving approval timelines.
2.	42) Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects. This recommendation would support the creation of new purpose built rental housing units which is required to stabilize rapidly increasing rental rates.
3.	B-3) 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.
4.	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. This encourages the construction of permitted projects in a timely manner after receiving approval ensuring that projects to increase housing supply are actually built. Consideration should be given to extending this "revocation authority" to certain planning permissions (.e.g site specific re-zoning applications).
5.	45) Improve funding for colleges, trade schools, and apprenticeships, encourage and incentivize municipalities, unions and employers to provide more on-the-job training and 46) Undertake multi-stakeholder education program to promote skilled trades.* Lack of skilled trades is a barrier to increasing housing supply.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
1.	1) Set a goal of building 1.5 million new homes in ten years.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  February 22, 2023 Council Motion that the City “accepts the challenge of building 47,000 housing units by 2031 and continuing Council’s direction for growth through intensification within the former Urban Boundary excluding Greenbelt lands”.
2.	2) Amending 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.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  The City recognizes these as important planning / housing goals but it is important to ensure other provincial priorities are maintained (e.g. sustainability).

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
		Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments
3.	3) a) Limit exclusionary zoning in municipalities through binding provincial action: allow “as of right” residential housing up to four units and up to four storeys on a single residential lot.*	X				The City of Hamilton has implemented these ‘as of right’ permissions in existing low density zones as required by Provincial legislation. The City recognizes the benefits such as contributing to transit supportive densities in low density areas but have concerns related to servicing costs and planning for adequate infrastructure / services.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
4.	3) 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.)	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  Planning staff are generally supportive of the intent of this action but note any changes to the Ontario Building Code must prioritize safety.
5.	4) Permit “as of right” conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use.	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  The City already has permissions for mixed use and / or stand alone residential uses in our Commercial and Mixed Use Zones.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
		Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments
6.	5) Permit “as of right” secondary suites, garden suites, and laneway houses province-wide.*	X				The City of Hamilton has implemented these ‘as of right’ permissions in the urban area as required by Provincial legislation. The City is working to implement these permissions in the rural area while ensuring the protection of groundwater. The City is supportive of this action but need to ensure there are necessary regulations / standards to protect tertiary septic systems on smaller lots in the rural area.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
7.	6) Permit “as of right” multi-tenant housing (renting rooms within a dwelling) province-wide.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City recently passed new low density residential zoning which has permissions for Lodging Homes. Staff support for this action is assuming appropriate OBC, fire code and licensing requirements are in place.
8.	7) Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  There are many changing factors such as demographics and enrollments which make this action difficult to implement and monitor.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
9.	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 insufficient to meet provincial density targets.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments
						OPA 167 provided permissions for up to 12 storeys along major transit corridors in the City of Hamilton. The City has completed a modelling exercise to determine if the provincial density targets can be achieved within our proposed MTSA's under the existing land use permissions. “unlimited” height and density permissions is not necessary to achieve provincial density targets and would have various implications related to infrastructure.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
10.	9) Allow “as of right” zoning of six to 11 storeys with no minimum parking requirements on any streets that have direct access to public transit (including streets on bus and streetcar routes).	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  There are existing permissions for up to 12 storeys along primary corridors in the City of Hamilton as implemented through OPA 167. The City is also reviewing the removal of minimum parking standards throughout lower city wards and parts of the Central Mountain along transit routes. These permissions would not be appropriate for all streets that our serviced by a bus due to large variation in level of transit service.
11.	10) Designate or rezone as mixed commercial and residential use all land along transit corridors and re-designate all Residential Apartment to mixed commercial and residential zoning in Toronto.	Already Achieved / Implemented	Support	Unclear Position	Oppose	Comments  N/A – relates only to City of Toronto

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
		Already Achieved / Implemented	Support		Oppose X	Comments
12.	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.				X	As reflected in the City’s response to Bill 97 and the proposed PPS (PED23145), the City is opposed to planning infrastructure around housing outside of municipal boundaries, particularly due to the significant financial implications.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
13.	12) a) 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.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  Through OPA 167, the City modified wording of its intensification criteria (Policy B.2.4.1.4b) related to neighbourhood character to remove requirement to “maintain and enhance” established patterns and form.
14.	12 b) 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.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments
15.	12 c) Establish provincewide 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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  There are concerns with applying a ‘one size fits all’ approach to items that are context specific.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
16.	12 d) Remove any floorplate (sic) restrictions to allow larger, more efficient high-density towers.	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  There are no floorplate restrictions in Downtown Zones.
17.	13) Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  While public consultation can add time to the approval process, it is important for creating better proposals being better accepted by residents and ultimately resulting in better proposals.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
18.	14) Require that public consultations provide digital participation options.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City is already using digital means for public consultation as a result of the pandemic. The City is supportive of the continuation of digital consultation provided a hybrid option is maintained for individuals without access to technology.
19.	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.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  There is already delegated authority for site plan approvals.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
		Already Achieved / Implemented X	Support	Unclear Position	Oppose X	Comments
20.	16) a) Prevent abuse of the heritage preservation and designation process by: prohibiting the use of bulk listing on municipal heritage registers.*	X			X	The City is supportive of undertaking built heritage inventories to ensure heritage buildings are protected from immediate demolition through placement on a Heritage Registry; however, the Province has already amended the Heritage Act through Bill 23 that limit the length of time in which properties may be listed on municipal heritage registers.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
21.	16 b) Prohibiting reactive heritage designations after a Planning Act development application has been filed.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  The Province amended the Heritage Act to place restrictions on issuing a notice of intention to designate after certain Planning Act applications have been submitted.
22.	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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  There are no current Ontario specific studies showing heritage designation has a negative impact on resale value. This action implies highest and best use should be based solely on economics.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an 'X' as appropriate)				
23.	18) Restore the right of developers to appeal Official Plans and Municipal Comprehensive Reviews.*	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments
						It is unclear how this action will increase the supply of housing. Appeals could delay the implementation of policy changes to increase the supply of housing.

24.	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.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	<p>Comments</p> <p>In the City's response to the Task Force Report (PED22071, the recommended approach would not account for delays in approvals caused by applicants or poor submissions. Deeming an application approved if timelines are not met due to delays by the applicant would be a major a concern. Such an approach could also encourage applicants to delay responses in order to "run out the clock" so that their applications gets deemed as approved. Complex applications and especially intensification require a very intensive</p>
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<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>	<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)					
						engineering exercise and can easily exceed timelines as a result. This approach could have significant impacts in terms of staffing levels required, which would result in significant fee increases in application fees. In addition, the recommendation would require the majority of the work to be completed upfront prior to deeming an application complete and does not allow for the municipality to work with the applicant to create a better proposal.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
25.	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.*	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments
						The City of Hamilton already has Business Facilitators that act to resolve conflicts and expediate approvals. It is not clear the role “approval facilitators” will have in the approval process or how their authority would fit within the current development review framework.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
		Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments
26.	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 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.			X		The City already has a Formal Consultation process in place to identify requirements for a complete application. There would be issues if revisions to plans result in new requirements not previously contemplated. Additional information is necessary respecting the “no liability” component would be implemented.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
27.	22) Simplify planning legislation and policy documents.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  This recommendation can be supported provided changes to policy are comprehensively reviewed to ensure there are no unintended negative consequences.
28.	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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  The City has concern with the implementation of a ‘one size fits all’ approach which may have implementation challenges.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
29.	24) Allow wood construction of up to 12 storeys.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City of Hamilton supports the ability of architects to design and specify a variety of sustainable building materials in response to climate change conditions, provided appropriate OBC, fire code and safety requirements are in place.
30.	25) Require municipalities to provide the option of pay on demand surety bonds and letters of credit.	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  The City of Hamilton adopted a Surety Bond policy in 2021.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
31.	26) Require appellants to promptly seek permission (“leave to appeal”) of the OLT and demonstrate that an appeal has merit, relying on evidence and expert reports, before it is accepted.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City is supportive of requiring appeals to pass a minimum threshold test but are unclear of the implementation of this action.
32.	27) a) Prevent abuse of process: remove right of appeal for projects with at least 30% affordable housing in which units are guaranteed affordable for 40 years.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City supports the development of affordable housing applications and currently expedites the review of affordable housing planning applications. There is uncertainty with this recommendation on how affordable would be determined and enforced.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
33.	27 b) Require a \$10,000 filing fee for third party appeals.*	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  This action raises equity concerns in the ability to participate in this process.
34.	27 c) 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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  This action raises equity concerns in the ability to participate in this process.
35.	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.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  Reduces administrative delay once a decision is made.
36.	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 punitive damages.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  It is unclear how this would be determined. Allowing for punitive damages is a significant departure from prior practice.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
37.	30) Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
38.	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.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Accelerating approvals does not mean the project will be built in a timely manner.
39.	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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  This action does not support the principle that growth should pay for growth. There may be merit in certain scenarios if there are public benefits to reducing or removing these costs.
40.	33) Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  The City already has non-statutory exemptions for qualified affordable housing development.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
41.	34) Prohibit interest rates on development charges higher than a municipality's borrowing rate.*	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Clarification is required as to what interest rate is proposed to be prohibited.
42.	35 a) Regarding cash in lieu of parkland, s.37, Community Benefit Charges, and development charges: 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.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  The City already reports annually on DC reserves. It is unclear how provincial review would impact this reporting. It is likely that such a requirement would create significant administrative workload, thereby reducing staff time available to process development applications.

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43.	35 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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  This may unintentionally increase inequity in communities. Most services are considered on a complete network basis and do not align with ward boundaries. A significant community need would need to be clearly defined.
44.	36) Recommend that the federal government and provincial governments update HST rebate to reflect current home prices and begin indexing, and that the federal government match the provincial 75% rebate and remove any clawback.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Not applicable at municipal level.

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45.	37) Align property taxes for purpose-built rental with those of condos and low-rise homes.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Does not take into consideration that valuation of condo buildings are typically higher than purpose built rental. The fiscal implications of this recommendation needs to be investigated. If it does result in a significant loss in tax revenue for the City, a stable funding source from the Province to compensate.
46.	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.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
47.	39) Eliminate or reduce tax disincentives to housing growth.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Recommendation not clear.
48.	40) Call on the Federal Government to implement an Urban, Rural and Northern Indigenous Housing Strategy.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
49.	41) Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
50.	42) Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
51.	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.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City recommends this action be broadened to all Planning Act approvals.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use)</i> <i>Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
52.	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.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  This action could assist with necessary infrastructure upgrades to accommodate growth but does not appear to support the principle that “growth should pay for growth” and would transfer the costs from developers to existing property owners.
53.	45) Improve funding for colleges, trade schools, and apprenticeships, encourage and incentivize municipalities, unions and employers to provide more on-the-job training.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
54.	46) Undertake multi-stakeholder education program to promote skilled trades.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
55.	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.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
56.	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	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments .
57.	49) Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  There is concern tying funding to these targets which are not always within municipal control. The City requires clarification on which funding is being reduced.
58.	50) Fund the adoption of consistent municipal e-permitting systems and encourage the federal government to match funding. Fund the development of a common data architecture standard, supported by an external expert committee, across municipalities and provincial agencies/ministries 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.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
59.	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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  This recommendation should be revised to utilize MOF forecasts in the absence of Provincial forecasts so municipalities are not required to redo Municipal Comprehensive Review Land Needs Assessment work.
60.	52) Resume reporting on housing data and require consistent municipal reporting, enforcing compliance as a requirement for accessing programs under the Ontario Housing Delivery Fund.*	Already Achieved / Implemented X	Support	Unclear Position	Oppose	Comments  OPA 167 includes policy direction to report annually on housing data.
61.	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.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Unclear how reporting on demand will be defined.

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62.	54) Empower the Deputy Minister of Municipal Affairs and Housing to lead an all of government committee that meets weekly to ensure our remaining recommendations and any other productive ideas are implemented.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Not applicable at municipal level.
63.	55) Commit to evaluate these recommendations for the next three years with public reporting on progress.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
64.	B-1) Call upon the federal government to provide equitable affordable housing funding to Ontario.*	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
65.	B-2) Develop and legislate a clear, province-wide definition of “affordable housing” to create certainty and predictability.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
66.	B-3) 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.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
67.	B-4) Amend legislation to: <ul style="list-style-type: none"> <li>Allow cash-in-lieu payments for Inclusionary Zoning units at the discretion of the municipality.</li> <li>Require that municipalities utilize density bonusing or other incentives in all Inclusionary Zoning and Affordable Housing policies that apply to market housing.</li> </ul> Permit municipalities that have not passed Inclusionary Zoning policies to offer incentives and bonuses for affordable housing units.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments  Clarification is required.

<b>HATF Recommendation</b> <i>(Note: Bracketed numbers are per the numbering in the original Task Force report; numbering in the first column is for Ministry use) Recommendations with an asterisk * have been implemented</i>		<b>Support or Oppose</b> (Mandatory Field – Please only mark with an ‘X’ as appropriate)				
68.	B-5) 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.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments
69.	B-6) Rebate MPAC market rate property tax assessment on below-market affordable homes.	Already Achieved / Implemented	Support	Unclear Position X	Oppose	Comments
70.	C-1) 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.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  Support in principle provided the pre-zoning process is public and transparent.
71.	C-2) All future government land sales, whether commercial or residential, should have an affordable housing component of at least 20%.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  Support in principle but it is unclear how this will be implemented and whether or not it applies to Crown corporations.
72.	C-3) Purposefully upzone underdeveloped or underutilized Crown property (e.g., LCBO).	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  The City is supportive of this recommendation where appropriate.

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73.	C-4) 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.	Already Achieved / Implemented	Support	Unclear Position	Oppose X	Comments  This does not support planning for intensification within the existing urban area where infrastructure and services have been planned.
74.	C-5) 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.	Already Achieved / Implemented	Support X	Unclear Position	Oppose	Comments  This may provide more uncertainty and feasibility for new affordable housing projects.