

Re: The Tourism Industry Association of Ontario's Submission for Provincial Policy Statement Review – Proposed Policies

ERO number: 019-0279

Notice type: Policy

Act: Planning Act, R.S.O. 1990

The following submission focuses on key areas of the proposed policies within the Provincial Policy Statement that we would like to see amendments, or greater clarity on, ranging from housing, to access to disaster relief funds for regions that are experiencing flooding. This submission highlights the key areas and recommendations we have regarding the development of affordable housing across Ontario. We recognize that Ministry of Municipal Affairs and Housing, is developing innovative solutions to the affordable housing crisis in Ontario. The Ontario tourism industry is the largest employer of youth in Ontario, and thus we are also the largest employer of renters, so our focus on affordable housing reflects our focus on growing our workforce in every region of Ontario.

Please see our recommendations italicized below the key areas of the proposed policies.

1. Increasing Housing Supply and Mix

- Support the development of housing to meet current and future housing needs, and add reference to housing options
 - *We recommend that explicit mention of affordability be included within the mandate to create housing to meet current and future demand.*
 - *We further recommend that a requirement be developed to have a percentage of purpose-built rentals across Ontario, as this is a key element of affordable housing in contrast to the development of condominiums.*

2. Protecting the Environment and Public Safety

The proposed draft policies for consultation would:

- Enhance direction to prepare for impacts of a changing climate
 - *We recommend that Climate Change Considerations and measures be included within all Environmental Assessments.*
 - *Enhance consultation protocols or processes for engaging with First Nations and Métis communities in a manner that aligns with the United Nations Declaration on the Rights of Indigenous Peoples, including the right to free, prior, and informed consent.*
- Enhance stormwater management policies to protect water and support climate resiliency

- *We recommend the continued expansion of access to provincial disaster recovery assistance across all regions and communities in Ontario. Extreme weather events that impact tourism businesses and operators, including flooding and high water levels require immediate access to recovery funds to prevent further losses to the business.*
- *We recommend that Disaster Relief Funds be made accessible to communities and businesses that fall outside of official Emergency Zones.*

3. Reducing Barriers and Costs

The proposed draft policies for consultation would:

- Require municipalities to take action to fast-track development applications for certain proposals (e.g. housing)

The tourism industry of Ontario employs more young people than any other industry in the province, with 23% of our workforce aged 15-24. We know that 50% of Ontario households rent their home, and 48% of Ontario renters make less than \$40,000 a year, and nearly half of Ontario renters pay unaffordable rental housing costs

- *We recommend that the fast-track of development applications for housing, be applied to affordable and social housing. As an industry that is the largest employer of youth, we are the largest employer of renters in Ontario. We recognize that there is a housing shortage across the province that negatively impacts our ability to house and grow our workforce.*
- Make minor changes to streamline development approvals and support burden reduction
 - *We recommend providing greater clarity on the minor changes to streamline the development approvals process, as it relates to affordable housing developments. Increased clarity will allow affordable housing proposals to be expedited in the approval process.*

4. Supporting Rural, Northern and Indigenous Communities

The proposed draft policies for consultation would:

- Allow flexibility for communities by clarifying perceived barriers to sewage and water servicing policies for lot creation and development in rural settlement areas
 - *At TIAO we recognize that the Ontario tourism industry requires tactical provincial policies that support sustainable tourism, effective land use planning, and the protection of our natural environment for future generations. As such, we recommend:*
 - *Existing septic systems that do not show any adverse impacts to the environment and/to the health of humans to be “grandfathered.”*

As you read through the proposed PPS changes, we would appreciate hearing your views on the following questions:

- Are there any other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?

At TIAO we recognize the crucial role that the Ministry of Municipal Affairs and Housing (MMAH) has in working with local governments and partners across Ontario to build safe and strong urban and rural communities with dynamic local economies, a high quality of life, and affordable and suitable homes for everyone. We further recognize that the economic growth of tourism requires access to affordable housing in every region of the province, as the lack of housing greatly exacerbates our growing labour shortage. As such, we have organized our key policy recommendations within specific points from the mandate of the MMAH:

- *With the return of the Ontario Municipalities Board and the passing of Bill 108 we recommend that the Ministry of Municipal Affairs and Housing repeal the imposed limits to the Inclusionary Zoning to certain specific locations instead of everywhere during a time when housing affordability across Ontario is a key issue. Specifically, we request that Part V 35.2 pertaining to By-laws to give effect to inclusionary zoning policies, in the Ontario Planning Act, 1990 be amended to provide authority to municipalities to determine where inclusionary housing zones will be located throughout their jurisdiction.*
- Are there other tools that are needed to help implement the proposed policies?
- **Fund construction and repair of social housing and affordable rental housing**
 - *We recommend that the Ontario government create a mandate to have a percentage of new housing developments be ‘purpose-built rentals’ as opposed to condos across the province. Purpose-built rental units are a key source of affordable housing. In Toronto in 2017 the average rent for a 1 bedroom purpose-built rental was \$1,194, while the average cost for a 1-bedroom condo was \$1,803¹.*
- **Set the annual rent-increase guideline and other rules related to rental housing**

We recommend that:

- *The Ministry of Municipal Affairs and Housing develop robust rent controls on all units in Ontario, including new builds.*

Tax and land use regulations are a strong incentive for developers to build rental housing. The removal of rent regulation from new builds effectively offloads the cost of unaffordable rents onto tenants. This further exacerbates the labour shortage within the Ontario tourism industry as it creates barriers for our workforce to accessing housing.

¹ Advocacy Centre for Tenant's Ontario 2018 Report: Ontario's Affordable Rental Housing Crisis.



Ontario has a growing housing shortage, and while the reasons for the shortage are geographically specific to each region of the province, the outcome is the same: the worsening of the labour shortage. Tourism businesses cannot continue to grow and drive the economy without the necessary support for the development of affordable and available housing in all regions across the province.