



**Toronto  
Real Estate  
Board**

SERVING GREATER TORONTO REALTORS®

January 24, 2019

**President**

Gurcharan (Garry)  
Bhaura

Ms. Rachel Simeon  
Director, Market Housing Branch  
777 Bay Street, 14<sup>th</sup> Floor  
Toronto, Ontario  
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**President-Elect**

Michael Collins

**Past President**

Tim Syrianos

**RE: Increasing Housing Supply in Ontario – Consultation Input**

Dear Ms. Simeon:

**Directors**

Ron Abraham  
Paul Baron  
Kevin Crigger  
Marco Da Silva  
Howard Drukarsh  
Susan Gucci  
Gareth Jones  
Josh Klein  
Lori Roberts  
Brian Torry

I am writing to provide you with the input of the Toronto Real Estate Board (TREB) on the current consultation regarding increasing housing supply in Ontario. Thank-you for this opportunity to provide our views.

As you may know, TREB is an association of 53,000 REALTORS® from across the Greater Toronto Area. As such, we have a unique ability to comment on housing supply and demand issues, as well as credible data that allows us to provide credible evidence-based input.

TREB strongly believes that current challenges in the Ontario and GTA housing markets are the result of a lack of adequate supply and variety of housing. With this in mind, we have provided our responses to the consultation questions below, and in the attached documents. Below is a summary of our recommendations, and the attached policy briefs provide more detail and supporting rationale on these recommendations.

**Speed**

**Chief Executive Officer**

John DiMichele

*How can we streamline development approval processes, while balancing competing interests and the broader public interest?*

TREB Recommendations

- Require municipalities to conduct reviews of municipal planning approval processes for new housing applications, with a goal of streamlining and shortening the process.
- There are numerous actions that municipalities can take immediately to reduce red tape and improve the efficiency of the planning approval process. For example, some actions that can be considered are:
  - Pre-designating and pre-zoning land for development
  - Ensuring that local Official Plans are updated
  - Ensuring that zoning by-laws are updated
  - Expedite environmental assessments for critical infrastructure



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- Streamlining the list of conditions for municipal approvals
- Implement best practices from other jurisdictions that may not currently be allowed in Ontario
- Optimizing the use of technology throughout the approval process

## **Mix**

*How can we make the planning and development system more effective to build the kind of housing people want, and can afford, in the right places with the right supports (e.g. schools, transit and other amenities)?*

### TREB Recommendations

- Require municipalities to undertake a review of their zoning by-laws and consider changes to allow for mid-density (missing middle) development; consider as-of-right zoning for some mid-density housing types where appropriate.
- Put in place mechanisms to prevent unjustified community opposition from stopping projects that are consistent with provincial policy objectives.
- Undertake comprehensive communication strategies to articulate the ability of mid-density (missing middle) developments to be seamlessly integrated into existing neighbourhoods.

## **Cost**

*How can we lower the cost of developing new housing while ensuring that funds are available for growth-related Infrastructure (e.g. water and sewer systems, fire and police services, schools, roads, transit)?*

### TREB Recommendations

- Streamline and shorten approvals processes.

*How can we make sure that serviced land is available in the right places for housing?*

### TREB Recommendations

- Ensuring municipalities pre-designate and pre-zone land for development .
- Ensuring that local Official Plans are updated.
- Ensuring that zoning by-laws are updated.
- Expedite environmental assessments for critical infrastructure.

## **Rent**

*How can we make the current system work better for landlords?*

### TREB Recommendations

- Consider provincial tax incentives to create and rent out properties.
- Encourage federal government to consider tax incentives to encourage creation of rental properties.
- Review municipal property taxation for rental properties.

*How do we encourage homeowners to create legal second suites and new rental supply?*

TREB Recommendations

- Set a deadline for municipalities to update zoning by-laws to be in compliance with provincial requirement for legalizing second suites.
- Ensure “second suite” is broadly defined to include ancillary and detached structures such as coach houses and garden suites.
- Review building code requirements for second suites.
- Streamline municipal property standards requirements for secondary suites.
- Consider regulatory structure for short-term rentals (e.g. Airbnb) which may be reducing supply of rental stock, such as secondary suites.

**Innovation**

*Are there any innovative forms of home ownership (e.g. shared ownership or rent-to-own models) that you feel could help make housing more attainable)?*

TREB Recommendations

- Review and consider innovative strata options (e.g. single lot strata) popular in other jurisdictions.

*Do you have any creative ideas to make better use of existing homes, buildings and neighbourhoods to increase the supply of housing?*

TREB Recommendations

- Land Transfer Tax reform – adjust rates and first-time buyer rebate for inflation in housing prices to help encourage mobility and get more existing homes to market.
- Require/mandate City of Toronto to also adjust rates and first-time buyer rebates to take into account inflation in housing prices to ensure the higher tax rates are only applicable on properties over the average priced home.

*What type of protections would help new home buyers?*

TREB Recommendations

- Adjust LTT rebates for inflation in housing prices and require City of Toronto to do the same; prevent any new municipal land transfer tax.
- Require registration of new home salespeople under the *Real Estate and Business Brokers Act*, 2002. Currently, new home sales representatives employed by a builder are not regulated to the same standards as REALTORS®.

As mentioned, the attached policy briefs provide detail and supporting evidence for the above recommendations.

Thank-you, once again, for this opportunity to provide our views. If you have any questions, please don't hesitate to contact Mauro Ritacca, TREB's Senior Manager of Government Relations at 416-443-8151 or [mritacca@trebnet.com](mailto:mritacca@trebnet.com).

Sincerely,



Garry Bhaura  
President

c.c. The Hon. Steve Clark, Minister of Municipal Affairs and Housing  
Ontario Real Estate Association