



## Pipeline to Permit Committee

### Revised Agenda

Agenda published February 24, 2025

Addendum published February 26, 2025

Revised Agenda published February 26, 2025

**Date:** March 6, 2025  
**Time:** 9:30 a.m.  
**Location:** Council Chambers, City Hall, second floor  
**Contact:** Deputy Clerk, [lisa.palermo@burlington.ca](mailto:lisa.palermo@burlington.ca) 905-335-7777, x7492

Pages

#### 1. Entrance

##### 1.1 Call to Order

##### 1.2 Land Acknowledgement

Burlington as we know it today is rich in history and modern traditions of many First Nations and the Métis. From the Anishinaabeg to the Haudenosaunee, and the Métis – our lands spanning from Lake Ontario to the Niagara Escarpment are steeped in Indigenous history.

The territory is mutually covered by the Dish with One Spoon Wampum Belt Covenant, an agreement between the Iroquois Confederacy, the Ojibway and other allied Nations to peaceably share and care for the resources around the Great Lakes.

We acknowledge that the land on which we gather is part of the Treaty Lands and Territory of the Mississaugas of the Credit.

##### 1.3 Approval of the Agenda

##### 1.4 Declarations of Interest

##### 1.5 Written Delegations

#### 2. Enlightenment

Enlightenment items include presentations and opportunities for education, state of the industry developer updates, and jurisdictional scans.

## 2.1 Presentations

- a. Ontario Developer Survey 2024: Perspectives from a Sector on Edge (PP-02-25) 1 - 43

## 3. N2: News and Numbers

News and Numbers includes Provincial and Federal housing initiatives, staff updates on Council directives and the Pipeline to Permit Report.

### 3.1 Pipeline to Permit Report

The Pipeline to Permit Self-Serve Dashboard shows the City's progress in hitting building permit and planning approval targets.

[Click here for the Desktop Pipeline to Permit dashboard](#)

[Click here for the Mobile Pipeline to Permit dashboard](#)

### 3.2 Contextual Updates

## 4. Enactions

Enaction items make recommendations for next steps and identify actions.

### 4.1 Next Steps and Action Identification

### 4.2 Information Items

- a. P2P Accomplishments and Terms of Reference review (LLS-19-25) 44 - 54
- b. 2024 Senior Government Advocacy (MO-01-25) 55 - 67

## 5. Envisions

Envision items focus on future housing and planning goals and connections to the City's strategic plans and complete communities vision.

- 5.1 *Housing and Community Improvement Plan update (DGM-28-25)* 68 - 73

Note: this document was published on February 26, 2025

- 5.2 *Response to recommendations from University of Waterloo students - Zoning By-laws and Housing as a Human Right: A Study of the City of Burlington (DGM-31-25)* 74 - 77

Note: this document was published on February 26, 2025

**6. Enhancements**

Enhancement items identify opportunities for policy, process and procedure improvements.

**7. Confidential Items and Closed Meeting**

Confidential reports may require a closed meeting in accordance with the Municipal Act, 2001. Meeting attendees may be required to leave during the discussion.

**8. Rise and Report**

**9. Adjournment**



Ontario Developer Survey 2024:

# Perspectives from a Sector on Edge



This and other sector surveys are available on the StrategyCorp website at <https://strategycorp.com/institute/reports/>

The opinions expressed in this report are those of the respondents and do not necessarily reflect the views of StrategyCorp.



# Ontario Developer Survey 2024: **Perspectives from a Sector on Edge**



The StrategyCorp Institute of Public Policy and Economy provides thought leadership on important public policy issues facing Canadians and their governments across the country by combining economic and policy expertise with key political insights.

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## Introduction

Since 2016, StrategyCorp has conducted an annual survey of municipal Chief Administrative Officers (CAOs) and City Managers from across Ontario which featured the voices of senior municipal administrators. In recent years, StrategyCorp has been expanding our surveys and reports to include Ontario Chiefs of Police, Ontario Police Services Board Chairs, Ontario Hospital CEOs, and Ontario Non-Profit Housing CEOs.

With an ongoing housing supply crisis, StrategyCorp identified that the direct experience of private sector homebuilders was underexplored. The objective of this report is to highlight their perspectives and insights as the industry navigates challenging circumstances.

The overwhelming majority of housing in Ontario – fully 95% – is delivered by private companies, meaning the development sector plays a crucial role in meeting the province’s housing goals. If Ontario is to meet its objective of building 1.5 million new homes by 2031, it can’t do it without a robust development sector firing on all cylinders. There are significant differences of opinion between industry and government on the best path forward. Fostering mutual understanding between the development industry and governments will be critical to achieving this ambitious goal.

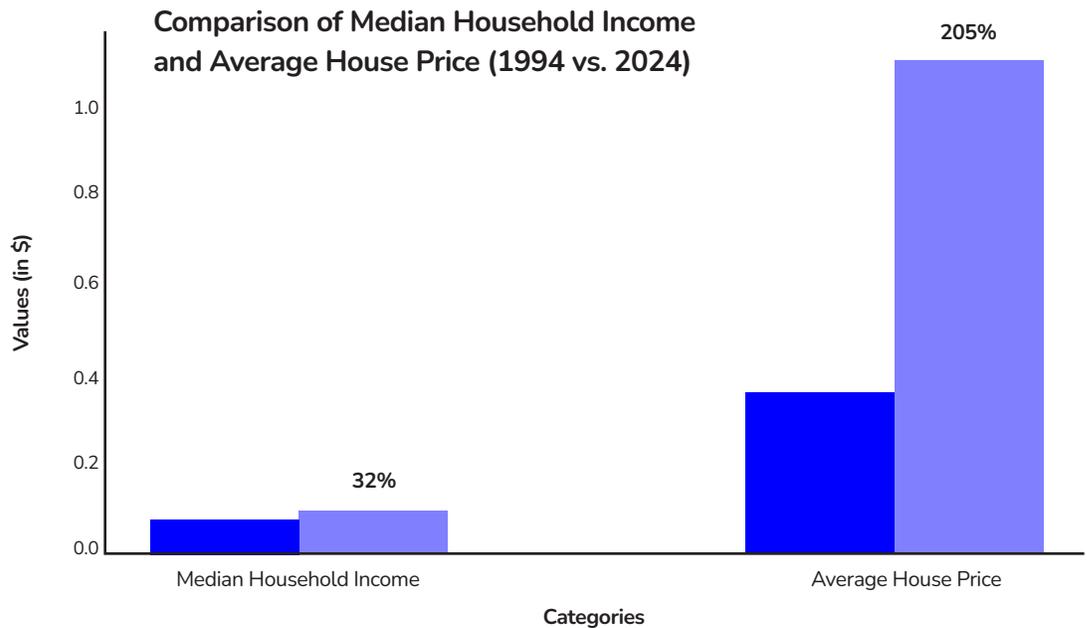
Ontario continues to grow rapidly, and while this is a good problem to have, it means that our policies and regulations must adapt to suit the new reality. The past two decades have been a period of consistent and significant change in Ontario’s land use planning rules and the development industry, alongside massive population growth.

At the turn of the millennium, Ontario’s population was just over 11 million people — today, it is 16 million and continues to grow faster than nearly anywhere else in the country. Under its medium-growth projection, Statistics Canada projects that Ontario will surpass 20 million people by 2048. While the federal government has recently adjusted its immigration targets, which may slow some of the short- to medium-term population increase, the fundamental patterns underpinning this growth are not likely to change.

The pace of housing construction has not kept pace with population growth, leading to a housing supply crunch that is significantly impacting affordability and further downstream effects which impact the quality of life and economic growth prospects for the province. The fundamental economic equation of supply and demand cannot be ignored, and the lack of housing supply has widened the gap between median incomes and home prices.

However, it would be overly simplistic to ignore other factors that have contributed to the deepening affordability crisis in more recent history. The negative impacts of high interest rates on builders and end users — as well as on investor demand in homebuilding — the effects of the COVID-19 pandemic and geopolitical conflicts on construction supply prices, increased labour costs and frequent changes to government planning policies and regulations all create headwinds which make building more housing at affordable prices more challenging.

To that end, StrategyCorp presents this report as a starting point for discussion about the current state of Ontario’s development sector and its connection to the housing crisis. Our aim is to present the perspectives of development industry leaders and to spark a conversation about durable solutions that can be implemented to rapidly increase housing supply across Ontario.





## Survey Methodology

Over the summer and fall of 2024, StrategyCorp conducted interviews with 21 real estate development executives across Ontario. These participants were selected for this report as they are responsible for investment and project development decision-making for their firms.

Taken as a group, participants currently have more than 109,200 approved homes in their development pipelines. More than half of these units are not currently economically viable to build. These units are spread out across the Greater Toronto and Hamilton Area (GTHA), Ottawa and parts of Eastern Ontario.

As with all our surveys, StrategyCorp made two promises to the participants:

- **We committed to faithfully and accurately record and report what they told us.**
- **We assured them that their comments would remain non-attributable.**

It is always our intent to represent the voices of participants as we heard them: honest and forthright. In some cases, quotes have been edited for brevity, readability, or to protect confidentiality, while remaining faithful to the sentiment expressed.

This report is qualitative research. While this survey is not intended to serve as a

representative sample, we do consider the conclusions to be reflective of the views of the development sector at this point in time.

We also acknowledge our role in collating, grouping, and analyzing the data. We believe the participants provided us with a candid snapshot of the trends and challenges facing the development industry and that we have done justice to what we heard in the pages ahead.

We hope our findings will invite further discussion about the state of Ontario's development sector and provide useful context and insights for decision makers at all levels of government.

**Note:** Over the course of conducting interviews, the Bank of Canada announced four interest rate cuts in June, July, September, and October, bringing the interest rate down from 5% to 3.75%.

**Note:** While this report was being written, the Government of Canada announced that they would be adjusting their immigration targets as follows:

- From 500,000 permanent residents to 395,000 in 2025
- From 500,000 permanent residents to 380,000 in 2026
- And setting a target of 365,000 permanent residents in 2027.



# Executive Summary

## Survive 2025

Through StrategyCorp's discussions with industry leaders, we set out to learn how economic and financial conditions, government policies and regulatory barriers impact their work and ability to put shovels in the ground. In the face of an uncertain economic future, where housing starts have plummeted and residential sales are down, but demand shows no signs of abating, the key goal of the industry is to somehow make it through 2025.

Meanwhile, decision-makers continue to overestimate the development sector's resilience to constant policy changes, particularly amid economic turmoil. This is a long-standing trend that needs to be reversed, or Ontario will find that the gap between the houses we need to build and the ability of the sector to build them will only widen.

**This is a Crisis:** We are in a generational-level crisis and governments aren't treating it like one. The industry is anxious about businesses being able to survive without launching new projects and completing existing projects. A significant gap remains between the cost of building new housing and what buyers are willing to pay for it. While interest rates have decreased in the last six months, lowering borrowing rates

have not yet been enough to spur investment. There is also widespread concern regarding the feasibility of building 1.5 million new homes by 2031 using the existing regulatory framework in the current economic climate.

**Uncertain Future:** Although there was no unanimity on what the next five to 10 years might look like, the consensus is they won't look like the previous 20. There was broad agreement that the status quo is not working and that interest rate cuts alone will not solve the problem. Governments have not yet grasped the scale of change required to get home construction on track again and their efforts to expedite approvals through deregulation and microtargeting investments have not yet delivered the intended results.

**Development Charges, Taxes, and Fees:** Most participants spoke about input costs as a barrier to providing housing. In addition to material and labour costs, development charges (DCs), taxes, and other fees levied by governments were raised as a significant issue. Despite the challenging climate for housing, most Ontario municipalities have continued to increase DCs. A long-overdue debate about how we should pay for the infrastructure required to support new homes and workplaces is only just beginning in earnest.

**Development Charges:** Fees collected by municipalities from developers at the time a building permit is issued to help pay for the cost of infrastructure required to provide municipal services to new development.

**Taxes:** Municipalities charge property taxes as a means to fund municipal services. Developers pay these as carrying costs on properties they have not yet been able to redevelop.

**Other Fees:** Some municipalities have special levies or fees attached to property sale and development, such as the City of Toronto's municipal land transfer fees, or specific, or specific dedications granted through the Planning Act.

**Process Problems are Nearly Universal:** Almost every participant, regardless of the municipality in which their project is based, spoke about process challenges and delays in obtaining approvals. Many talked extensively about duplication of regulation where they went through regulatory processes or cycles of processes more than once before they could start building.

**Significant Development Activity is Minimal Outside of Rentals:** As housing starts have decreased across the province, participants agreed that virtually all new projects getting greenlit are purpose-built rentals. This is primarily because of funding made available by the Canada Mortgage and Housing Corporation (CMHC) or HST exemptions to spur this growth.

**Red Tape and Inconsistent Planning Rules:** Participants also talked about the lack of coordination between different levels

of government and between departments within a single municipality leading to extended delays. Staff turnover at the local level, especially across planning departments, means that participants' applications go through duplicate rounds of evaluation, delaying timelines and costing more money than initially budgeted.

**Deals Don't Pencil:** For most development projects today, there are too many factors making the economics of building unfavourable. The financial headwinds include DCs and taxes, pre-sale requirements, escalating costs of labour and materials, interest rates, and costs to acquire new land. As a result, margins have been significantly reduced or in many cases eliminated, meaning projects do not go forward.

**Lenders and Borrowers Have Less Appetite for Risk:** Given the challenges highlighted, the appetite for risk has reduced significantly as well. Due to a lack of non-recourse financing in Canada, many developers are required to put up their own assets on projects and risk losing their personal property to get projects started. That's one reason more developers are stepping back from starting new projects. Lenders also often require minimum projected profit margins and high pre-sale numbers, some of which may be unreasonable in the current economic context. As margins get squeezed, traditional financing becomes more difficult or more expensive to secure.

**Skepticism over the Public Builder Model:** Many participants expressed significant skepticism at the prospect of a municipality "being in the business of home building" but did offer insight into how more government involvement could work.



## Negative Market Sentiment and Economic Headwinds

Current economic conditions are significantly impacting project development. Challenges securing financing for new builds and economic shifts are influencing strategic decisions about which projects to pursue. One unavoidable conversation is around the continued rise in development charges in major urban centres, and the related public debate about who should pay for housing-enabling infrastructure. The rising costs of construction materials – driven by supply chain disruptions – labour expenses, and inflation, all create further headwinds against construction in the current context. Buyers, too, are facing obstacles from financing limitation to deeper affordability issues, which are also putting downward pressure on the market.

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### WHAT WE HEARD

Participants highlighted an oversupply of smaller, “investor-class” housing units and noted that with investors largely leaving the housing market in the province, there is a lack of demand for these types of units.

Despite the overall housing shortage, available inventory is often unaffordable for new home buyers and not desirable for end users based on current prices.

New homebuyers who can afford to close purchases appear willing to sit on the sidelines to wait for deals on already-built units as many existing homes are more cost competitive than prebuilds – a near complete inversion of historic trends.

Despite many homebuilders’ willingness to cut pricing to attract buyers, there is only so much they can do to spur sales while still earning a return. To secure construction financing in Ontario, developers must presell 70-80% of a project’s units. That benchmark is becoming extremely difficult to achieve, leading many companies to pause for-purchase housing projects until conditions are more favourable or investigate the potential to pivot to purpose-built rental.

Many participants stated that these new market conditions are leading to significant changes to their firm’s business model and partnerships. This ranges from who finances projects, to how dense they should be, to who supplies the finishes – and all of these changes occurring in such a short timeframe, even though necessary, is exceptionally high risk for the health of their organization. Very few traditional condo projects can overcome these hurdles in the current environment.

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## HIGH DEVELOPMENT CHARGES PREVENT HOUSING STARTS

Unsurprisingly, development charges, sales and land transfer taxes, and other government fees and soft costs were identified by virtually all participants as barriers to building. They recommended everything from eliminating DCs completely to reducing them to pre-2009 levels, exempting more types of new housing from provincial and federal portions of the HST, or reducing the land transfer tax.

Development charges have risen at substantial rates, with new builds expected to pay for the expansion of servicing required for population growth, the well-worn concept that “growth should pay for growth.” Some have argued that this is a responsibility that all residents should bear through their income, or property taxes, and should not fall to those building housing to front the costs which are ultimately borne by home buyers.

As a reference point, the City of Toronto, like most fast-growing municipalities in Ontario, sets development charges based on per-person occupancy averaged out across different unit types (e.g., fewer expected residents in studio or one-bedroom units results in a lower charge than for two-bedroom units or detached houses). Since 2010, Toronto has increased charges 10-fold, and today DCs add anywhere from \$10,000 to \$100,000 to the price of a new home. While we highlight Toronto here, similar steep increases have occurred across the province, most notably in other large population centres. To take one example, the City of Ottawa -- Ontario’s second-largest city and where roughly 25% of the province growth is expected to occur -- recently increased their DCs by as much as 500% over the same period. The main takeaway was that these charges, taxes, and fees are directly contributing not only to the cost of doing construction, but ultimately the affordability of the units being purchased, as these costs will get passed along to the end user. These fees are within the government’s purview and can be controlled.



**I believe that development charges are an intergenerational wealth transfer from millennials to boomers and it needs to be undone. I think that the way that infrastructure should be paid for is through user fees rather than an upfront capital charge. Every boomer who bought a house didn't pay DCs. Every millennial has to pay them.**

**Many of the line items in developers' budgets cannot be removed or lowered as they are influenced by forces outside our control. There isn't much room on the construction material side of things to come down. The punch line is we need to cut taxes.**

- “Municipalities keep asking for more from us without realizing how this affects the bottom line, and the significant amount of risk developers take on... Recent years have seen margins get smaller and smaller due to escalating costs. Municipalities can become better partners by better understanding the bottom line. They think we have endless pockets and will never feel the pinch, so they push and ask for more.”
- “There are too many DCs up front in today's market. It just doesn't work. If more was deferred, and it was paid as housing came along, this would make the payment of DCs way easier.”

- “Municipalities often don't understand or appreciate the risks developers take. Their perception that developers have endless resources has led to excessive costs through development charges, community benefits, and other fees, which significantly delays and hurts our ability to build attainable and affordable housing.”
- “Development charges and municipal fees have skyrocketed. These are eating into profits and making some projects unviable before they even start.”



- “The cost of development charges and municipal obligations have risen significantly. While construction costs have spiked and are softening, DCs keep going up, making it harder to make projects viable. Developers are absorbing more of these costs, but at some point, it's unsustainable.”

## RISING COSTS

Increasing costs in the form of development charges, labour, and materials were the most cited reasons for project pro formas not penciling in today's market. Participants explained how they had to compete with infrastructure projects (transit, roads, water, and wastewater, etc.) for labour and materials. After the pandemic, supply chain issues led to an increase in costs of materials. While inflation has abated, costs have not been materially reduced.

**“It's difficult, with homebuilders needing to both keep pace with general inflationary costs, alongside the inflation to wages that is required to attract workers. Perhaps this gets better in 2026-27”**

- “The rising construction costs and labour shortages are making it impossible to get projects off the ground. We are looking at ways to cut costs, but it's a challenge.”
- “The cost of building is just exorbitant, and developers are not making profit hand-over-fist by any stretch. Many of these projects are very, very thin in terms of margins.”

## INVESTORS LARGELY ABSENT, AND END USERS AREN'T BUYING ENOUGH PRESALE

Participants directly linked the decline in sales, particularly presales, to rising interest rates, making buyer financing less affordable. In the past, some condo projects reached

presale targets within days, but those buyers are no longer present. The absence of investors, who often represented up to two-thirds of required presales, is a major shift.

These investors – typically individuals or small corporations buying multiple units to rent out – have been driven away by high interest rates and flat or declining prices, which make it difficult to justify the investment. Many, especially those holding variable rate mortgages, have also resorted to selling their units to avoid significant equity losses.

Few believe investors will return in numbers sufficient to close the financial gap created by high rates. This skepticism seems warranted, as even with recent rate cuts, investors remain hesitant or focused on offloading inventory — competing directly with the presale market.

This lack of investor activity also undermines project financing, as pre-sales from investors are a crucial source of capital. Without this funding, developers struggle to launch projects, further reducing housing supply in an already undersupplied market.

Foreign-buyer restrictions have compounded these challenges, stalling what was once a vibrant market. Developers are increasingly reliant on end-user buyers, who historically have not driven the same level of demand.

Many end-users who can remain in the market in this environment now appear to favour resale condos, which are often 30% less expensive due to construction cost disparities and tend to be larger than newer units.



“The high interest rates have peeled away investors from the market. People aren’t launching as many condos as they used to. There’s been a significant reduction in construction and development activity, and it’s having a knock-on effect on industries linked to development, like lawyers, brokers, and appraisers.

“Cranes are often used to signal the sector’s health, but they’re just a lagging indicator of what was going on three to five years ago. People often complain about construction interrupting their lives today, but it’s going to be very quiet come 2027 and 2028.

“I think interest rates are scaring people away and probably causing people to rethink where they live. But I also think the foreign buyer ban had a big impact on the condo market as well because a lot of these condos were being purchased by investors who are probably still sensitive to interest rates. And that’s another reason why we have seen this slowdown.

- “We have pushed the pause button on projects simply because the market isn’t there. If we were to launch a project we’d sell maybe 10 units, but then we would be stuck with hundreds of unsold units and unable to get financing. The people who put deposits down would have to wait years until the building got going. The reality is people just can’t afford to take on mortgages right now, so condos are not being built. That’s out the door.”
- “In early 2021, we tried to launch a condo downtown and killed it because there was just no market for it. We ended up converting it to a rental building.”
- “I’m not sure if many people will admit to that, but realistically you’re getting a lot of investor buyers. That’s your largest buyer pool. I don’t know where those investors come from. It could be a mix of foreign investors, people with excess capital who are willing to invest in and buy a second or third or fourth unit. That that pool has pretty much dried up.”
- “The root cause why [investors] have disappeared is because they don’t believe they can make money investing in condos. Investors look for where they’re going to make money and when you build a brand-new condo and it’s priced 30% higher than a resale condo because that’s the cost of building it there, then their attitude is, ‘Why would I buy that condo when I can just buy the resale?’”

## AFFORDABILITY

Higher interest rates and current prices make it difficult for buyers to afford new homes. Additionally, inflation and low wages have hindered buyers’ ability to save enough for a downpayment.

As noted, the increased construction costs that are passed on to the consumer makes existing stock sometimes 30% less expensive per square foot than pre-sale, while also offering larger unit sizes.

**“Buyers aren’t in a rush right now because nothing is moving in the market, and the interest rates are high. Many young people today don’t save for a home, believing they can never afford one, so they spend instead. Meanwhile, investors have pulled back because the interest rates make it unattractive.”**

**“The stress test has overstayed its welcome in this high-interest environment. Buyers are either unable to qualify or simply opt to wait. First-time buyers in particular face an uphill battle due to lack of incentives.”**

- “They can’t afford what we’re putting out. They can’t afford \$1,200-\$1,300 a square foot. People are worried. Nothing is a given in this equation. Development charges are still going up. Construction costs are still massively high. Interest rates are still high. What you’re saying is, ‘Will the average purchaser step up and fix this problem by making it their problem- by absorbing all of this?’ And I think people have responded en masse and said, ‘No.’”

## DEALS JUST DON’T PENCIL

Participants discussed the various pressures they face in the current economic environment, leading many to delay development timelines, sometimes with no start dates in sight. This has resulted in developers shouldering significant holding costs that accumulate over time, impacting project viability and reducing the potential for market-driven affordability when overall conditions improve.

A common theme was the difficulty in securing financing, as banks tighten lending requirements and investors sit out of presales due to market instability.

There was also a focus on the challenge of meeting institutional partners’ expectations on the expected margin. Developers expressed concerns that current new home sales activity isn’t high enough to justify moving forward, especially as prices for resale homes are below the levels seen in 2021-2022. While larger firms may be able to sustain losses temporarily, smaller, and mid-sized developers lack the financial resources

to lower prices substantially or inject large amounts of equity without reliable financing.

As a result, developers are exploring financing options outside of Ontario, with some out-of-province lenders more willing to support projects with lower pre-sale requirements than those typically expected by Toronto-based lenders and financial partners. This shift underscores a search for more flexible financing solutions amid a challenging market landscape.

**We’ve had to pause certain developments until we see more stability in the market, especially on the financing side. It’s too risky to continue at this stage.**

- “The economic downturn has made it difficult to get investors on board, and without that financing, we’re facing delays on several projects.”
- “Banks are tightening up on lending, so financing is tighter.”
- “It is an expensive holding pattern. Even though projects aren’t moving, you’re still paying costs every month – whether it’s mortgages, insurance, fire watch, security, or whatever. It all adds up, and time is money. The longer you wait, the less viable the project becomes.”
- “We’re not in the business of taking risks without some reasonable profit expectation, and right now, sales prices we need haven’t been seen since 2021-2022. There’s no certainty if or when those will come back.”

- “The giants in the industry might be able to drop prices below cost to get projects off the ground, but most groups can’t afford to do that. Smaller and mid-sized developers just don’t have \$200 million to inject into a project if banks won’t finance it.”
- “We know that the condominium market is dead for the time being and I don’t say that lightly. But people can’t afford to take on a mortgage right now.”
- “We are speaking with lenders outside Ontario who understand how to finance projects on 40-50% pre-sales, compared to the 70-80% pre-sales that the Toronto banks are used to. It has been an interesting shift, talking to people who seem to understand the market better out west.”

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## STRATEGYCOP’S PERSPECTIVE

The fundamentals of the housing market in Ontario’s large urban centres appear to be fundamentally broken. Homebuilders have been hit with a barrage of challenging conditions which threaten to stall a significant portion of planned housing construction for the foreseeable future, all while demand continues to increase.

It remains unclear when conditions as disparate as population growth and financing will change sufficiently to get the industry back to producing housing yields that could begin to close the gap between what we have and what we need for a healthy market. So far, this does not appear to be the case. What

is clear is that there is no single economic or policy lever which can be pulled to get the situation back on track.

While some observers have suggested that investor participation in the market helped cause the run-up in prices and even the shrinking of unit sizes, the fact remains that investor capital was a fundamental assumption of the development market when it functioned well, and the absence of it today is a challenge with no obvious solution. These investors also provided much of the early capital requirements that would enable projects to proceed – benefitting end-users who bought units they intended to live in the same buildings.

Since we began interviewing participants for this report, we have seen a few positive signs of recovery, but nothing transformative. The Bank of Canada has made four interest rate cuts, dropping its policy rate from 5% to 3.75% and has signaled that further rate cuts could be on the horizon. The Bank of Canada makes its next rate announcement on December 11th. This could help buyers qualify for a mortgage and existing investors reduce their carrying costs, while also reducing carrying costs and construction loan pricing for builders.

The federal government also announced changes to mortgage rules which will give first-time homebuyers and buyers of new builds the option of 30-year amortization on insured mortgages (compared to a 25-year amortization) and increasing the \$1 million price cap on insured mortgages to \$1.5 million. These changes should help buyers afford

more at the margins, but they don't appear to have shifted the market fundamentals as of yet.

The federal government should examine whether a temporary measure offering 40-year amortizations for young buyers purchasing their first homes would assist in promoting housing affordability. The previous 40-year mortgage era was brief, starting in 2007 and ending in 2008 amid concerns of potentially inflating a housing bubble akin to that which burst in the United States. The "bubble" risk could be mitigated through limiting longer-amortization mortgages based on the borrower's age (i.e., they would not reasonably expect to retire over the amortization period), that they live in the home they purchase, and that it is available only for first-time homebuyers.

In Toronto, Mayor Olivia Chow has introduced a new incentive for purpose-built rental projects which would see a deferral of development charges and reduced property taxes for qualifying projects that have at least 20% affordable units. While they are currently only offering these incentives for up to 7,000 units, more will be possible if the federal and provincial governments provide funding for up to 13,000 more. At the time of writing, while there have been some encouraging statements, neither government has accepted Mayor Chow's invitation to support her initiative.

Nevertheless, it is this type of creative policymaking that reflects the scale of the challenge the industry is facing.

The program also highlights a harsh reality: building our way out of this hole will require public investment.

The province has taken a different approach by directly funding housing-enabling infrastructure with the objective of unlocking more housing immediately but also lightening the load on municipal capital budgets funded by development charges.

Many participants raised this as part of a growing public conversation about who should pay for infrastructure. Should growth pay for growth through development charges, or should the broader tax base fund infrastructure that ultimately helps grow the economy? Our participants were quite aligned in their view that reducing development charges will be necessary to kick-start the market, but it should be noted that this brings with it another difficult set of policy choices.

While there are some clear signs of governments taking positive steps (such as the City of Vaughan deciding to roll back DCs to their 2018 levels), it does not yet appear to be enough to push through the significant headwinds in the market.

Shifting the market fundamentals will require some combination of further external price relief (e.g., lower labour costs, lower interest rates) and bolder policy moves that get projects to pencil (e.g., significant reduction in development charges). It will also require challenging the public and political perception that reining in fees and charges won't just pad developer profits but rather help get housing supply built, ultimately leading to a more affordable market. To the layperson, this paradox is evidenced by the current housing market having slowed considerably, but with no significant changes to the costs of buying housing.

Our view is that big policy swings are justifiable because of the extent of the housing crisis we are in and the dire straits of those in the only industry – home builders – that can solve it.





## A Market Adapting to Structural Change

The development industry is still adjusting to the current financial and market landscape, with many focusing particularly on strategies for making financing work when traditional models do not. Projections for Ontario's largest markets (GTHA and Ottawa) over the next five years are challenging to make, considering potential shifts in demand and pricing. With so many projects approved but not currently economically viable, expectations around the viability of those projects will force many to explore whether these projects might be reconfigured or reconceived to adapt to economic conditions.

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### WHAT WE HEARD

In response to current economic pressures, participants are exploring alternative financing strategies, with some shifting away from traditional bank loans and financing options toward private investors, equity partnerships, and lenders outside Ontario.

Concerns about high-risk loans and the lack of non-recourse financing in Canada were prevalent, particularly for smaller developers who, without large cash reserves, are struggling to weather this market downturn. The tightening credit environment has pushed many to seek creative financial solutions to bridge funding gaps.

Faced with escalating costs, some developers are pivoting from large master-planned communities with upwards of 1,500 units to smaller-scale infill projects with unit counts of between 150 and 400, making financing, budgets, market absorption, and ultimately, risk more manageable.

Another broad trend participants discussed was the shift from condos to purpose-built rentals. Rental development has several relative advantages in today's market, from new government incentives to the removal of HST to not needing to pre-sell in a down market. Funders for purpose-built rental also tend to be more resilient to market shifts and are patient enough to wait for long-term returns. However, this pivot is challenging for developers without deep roots in the rental market, as it requires adjustments to entire business models and forming new partnerships.

Looking ahead, there was little agreement on the future of the housing market over the next five to 10 years, but near unanimity that it will not look like the last 20 did. Participants expressed doubts about achieving Ontario's housing targets under the current conditions, noting that economic challenges and labour shortages are likely to worsen in 2025. Many anticipate continued housing supply challenges and lingering uncertainty in the condo market for quite some time.

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## INVESTIGATING NEW FINANCING MODELS

Participants described a challenging financing landscape due to current economic conditions, leading many to explore alternative approaches to sustain project development. Several respondents described new partnership structures and joint ventures to mitigate risks associated with traditional debt financing. Private investors and alternative lenders are playing a critical role in bridging financing gaps left by cautious traditional banks.

However, developers still face significant obstacles, particularly smaller and medium-sized firms that struggle with stringent equity requirements and limited cash reserves. This has created disparities, with larger players better equipped to adapt to market pressures. The high personal risks developers face in Canada, compared to the availability of non-recourse financing in the U.S., further exacerbate these challenges. In Canada, developers must provide personal guarantees, placing their assets, including their homes, at significant risk — a systemic issue that limits broader participation in development.

The consensus reflects a shift towards seeking innovative financing models as developers navigate tighter lending environments and heightened equity demands, with the risk appetite across the industry notably diminished.

**“For the big developers, it’s easier to adjust to market conditions. They have the cash reserves to weather the storm and lower prices where**

**needed, but for medium and smaller players, it’s much harder. The financing requirements are tough, and without significant equity, smaller developers are struggling to get their projects off the ground.**

- “We’re considering alternative financing models, including joint ventures and partnerships, to mitigate the risks of relying on traditional bank loans.”
- “We’ve had to turn to private investors and alternative lenders to cover the financing gap that traditional banks are no longer willing to fill.”
- “We’re now focusing on financing through equity partnerships. It’s too risky to rely solely on debt financing in the current environment.”
- “The appetite for risk is so much smaller than it would have been before because the value isn’t there.”
- “In the [U.S.], developers can get non-recourse financing but that doesn’t exist in Canada. As a developer your house is on the line and if a project ends up in receivership, you are at the risk of losing your personal residence. You can get a loan with a corporate entity, but the bank will want a personal net worth guarantee. How do you tell your spouse, your family that I want to be a development entrepreneur, we just need to be OK with potentially losing the housing. If we had different financing available to developers in Canada, we would have more people at the table.”

## PIVOT TO SMALLER PROJECTS AND RENTALS

In part due to the reduced availability of investors who in recent years made up the bulk of pre-sale buyers, participants described a substantial shift from condos to purpose-built rentals. This change is also driven in part by the relative stability and comparatively reduced financial risk of rental projects (i.e., a low rental vacancy rate almost ensures swift stabilization).

Shifting from condos to rental is not as simple as incorporating and registering the building in a different way. It almost always means design and architectural changes. For many participants, it meant forming new partnerships with large-scale “patient” investors, notably pension funds, who are more willing to finance rentals in the current economic climate.

Tax incentives further encourage this direction and, in the view of participants, are making a material difference in projects going ahead in the short term. The HST exemption on rental construction introduced by federal and Ontario governments and CMHC funding streams to support rental development are cited as major contributors to the improved viability of rental and a general lifeline to the industry overall.

However, not all developers are equipped to pivot smoothly. Firms with limited rental experience face challenges adapting to the required ownership structures and partnership models specific to rental

developments. As a result, while many developers view rentals as a safer alternative, some remain constrained by their existing business models and lack of operational flexibility, impacting their ability to capitalize on this trend.

**We have pivoted several projects to purpose-built rentals instead of condos. Government incentives, such as the HST credit for rentals, have helped make this shift more feasible.**

- “We’ve shifted our approach to focus more on rental buildings because they’re less risky in this market, especially when we can partner with pension funds.”
- “If a developer was going to build 10,000 units, now they are going to build only 2,000 because their capital is stretching them thin.”
- “We normally do condos, but it seems rental is the only place where there’s any movement. Are we looking at doing more rental? I don’t think we can make that shift so quickly. It’s not an easy pivot. What do we do with what we have in the interim? I don’t think there is a home run solution.”

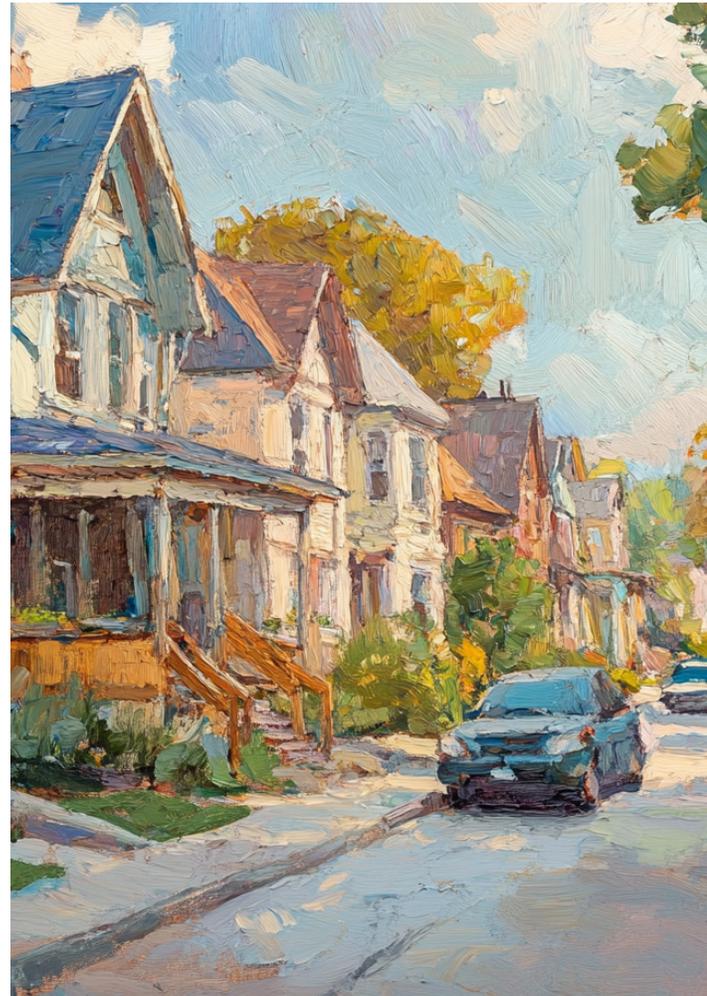
## **ONLY CONSENSUS ON THE FUTURE IS THE MARKET WILL NOT REVERT TO PREVIOUS NORMS**

Participants expressed uncertainty about the long-term future of the housing market and development sector, with little consensus on what it might look like five to 10 years from now. However, they strongly agreed that the current housing crisis won't be resolved without addressing the pressing financial and planning-related challenges facing the industry today. Developers underscored that achieving Ontario's target of 1.5 million new homes by 2031 will be increasingly difficult in the current environment.

Participants highlighted the need for fundamental changes in financing options, tax structures, and regulatory approvals to make housing more feasible and meet demand. The anticipated impact of a multi-year pause in the condominium sector, coupled with diminishing consumer confidence, raises additional concerns about long-term supply and affordability. Without coordinated government support and systemic reforms, participants believe Ontario's housing shortage will deepen further in 2025 and beyond, with fewer new projects moving forward and homeownership remaining out of reach for many.

**We'll still have a housing crisis in 2026, and I assume people will still want to live in Toronto in 2026 ... except there will be even less supply than today.**

**It's going to get much worse in 2025, which is going to lead into the sentiment of 2026. People generally leave an industry when there is a bit of a recession. There will be a recession in the condominium construction industry. Generally, when people leave a sector, they go find another job. They usually don't come back. This means it will take longer for the industry to come back.**



- “I think five years might be tougher to project than 10 years. I am reasonably confident that Toronto remains an attractive place for people to move to, for capital, to invest in and for employers to locate in. The fluctuations in the shorter term are harder to predict.”
- “I don’t know when the condo market will come back to what it was before, or if it will be back to what it was before.”
- “There are those who believe an interest rate adjustment will be the magic bullet here – I don’t subscribe to that theory. Customer and consumer confidence has been shaken in this industry.”

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## STRATEGYCORP’S PERSPECTIVE

While we heard a range of perspectives from participants about what the future of our housing market will look like, it was clear from all conversations that the sector sees itself in the midst of a generational transformation.

Collectively we agree the changes will be profound, but it is nearly impossible to predict what the end result will be. Exemplifying economic Darwinism, those who thrive will likely be those who are most adaptable to the changing economic conditions. Waiting for the old status quo to return isn’t an option.

While the pivot was far from simple, shifting to rentals has clearly made many projects viable today that wouldn’t be otherwise. We expect most new starts in 2025 to be

purpose-built rentals, some of which were originally planned and approved as condos. With reduced or eliminated development charges and no HST payable for these types of developments, the relative success of rentals in these challenging conditions makes a strong case for reducing taxes on all developments and aiming towards a more agnostic policy which focuses on housing abundance.

It is also promising that some in the development sector are reaching out to players in other markets. For example, some participants discussed engaging with new, western Canadian financial partners. In British Columbia, there is a cadre of financial partners who are accustomed to investing in developments geared solely to end-user purchasers which achieve significantly lower pre-sale thresholds than those expected in Ontario with its higher expectation of investor-purchaser participation.

Much of the slowdown in new construction starts today won’t be felt until 2027 when the effects of the 2023-2025 slowdown are most apparent – an anticipated drop-off of construction activity. Based on these trends, absent other major economic shifts or policy interventions, we should expect the housing supply crisis to get worse before it gets better. In the meantime, innovative players in the industry are doing their best to keep afloat through these headwinds. We wish them success.



## Non-Financial Barriers and Structural Concerns

Non-financial barriers add to uncertainty, prolong project timelines, and often diminish projects from what they otherwise could be. From municipal regulations to the perception of a broken planning process, non-financial barriers arguably act as a brake on development as much as the financial ones. There are clearly identifiable attitudinal issues in the sector, with a breakdown in trust between parties harming their ability to meet the challenge of the ongoing housing crisis.

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### WHAT WE HEARD

All participants had stories of interactions with municipal officials and the approvals process that resulted in unplanned delays and added costs. Many highlighted the large number of people and departments involved in permitting, each requiring sign-off, significantly prolonging timelines. Staff turnover within planning departments often means that new personnel restart reviews, further slowing down approvals. These delays, coupled with the high costs of the approval process, ultimately increase project expenses that are passed on to buyers.

In addition to bureaucratic hurdles, an uncertain policy landscape poses further challenges. Frequent, abrupt shifts in

government policies — such as changes to affordable housing requirements or back and forth shifts on development charge rates — raise risks, particularly for smaller developers with less capital to absorb such changes.

Participants expressed frustration over what they saw as a disconnect between policymakers and the realities of the development sector, emphasizing a need for greater partnership and understanding. The unpredictability of regulatory changes creates hesitation to initiate new projects and a need for greater financial buffering, as developers worry that mid-project policy shifts could undermine financial viability. When governments change rules to attempt to streamline processes, some participants noted that approval bodies often acted as if nothing had changed and found new ways to slow down approvals.

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### RED TAPE AND SLOW TIMELINES IN THE PLANNING PROCESS

Participants voiced extreme frustration with municipal planning processes, which are seen as a major barrier to housing development. They described the approval process as unnecessarily complex, with repeated submission rounds and new requirements

emerging at each stage. Sequential processes, such as requiring zoning approvals before site plan applications, were cited as particularly time consuming, with timelines often stretching from two to three years – or more.

A recurring complaint was the phenomenon of a regulatory “double tap,” where developers are subjected to overlapping and time-consuming reviews or redundant requirements. For instance, some participants noted being required to seek feedback from both a design review panel and an urban design department, only to receive conflicting advice. Others described frustration with needing to commission costly studies to analyze development impacts on concerns like wind or sunlight conditions, even though their proposal conforms to municipal guidelines that are said to be designed precisely to mitigate these very concerns.

Participants noted that these inefficiencies discourage smaller developers, who often cannot absorb the additional costs and delays. They also highlighted a lack of incentives for mid-rise development, which faces the same lengthy approval process as high-rise projects, limiting its potential as a viable urban housing option.

The lack of coordination between different levels of government compounds these issues, further slowing timelines and inflating development costs. Several participants noted an erosion of collaboration and trust between public and private sectors, describing the relationship as increasingly adversarial. Last-minute political interventions and

unanticipated municipal decisions were also identified as sources of unpredictability and frustration.

Some participants pointed to international models, such as California’s streamlined residential use permit system, as examples of how consolidating approval steps could reduce inefficiencies. The consensus view of participants was that without significant reductions in red tape and a more efficient approval process, achieving meaningful increases in housing supply will remain a challenging goal.

**“The approval process is painfully slow. We lose months, sometimes even years, waiting for permits and zoning adjustments.”**

**“Municipal delays are also a big factor. For example, in Toronto, they’re no longer accepting zoning and site plan applications concurrently. Developers must go through the zoning process first and only then can they submit for site plan approval. That adds significant time to the process. Previously, we could get through both in about two and a half years. Now, it is probably going to take between three and three and a half years.”**



- “The municipal approval process is cumbersome and slow.”
- “The planning process is a huge bottleneck. Every delay adds costs, and it’s really discouraging smaller developers from even trying to build here.”
- “The biggest issue is the red tape in the approval process. There is a significant delay between getting draft plan approvals and securing building permits, and the various city departments are not always on the same page, causing further delays.”
- “There is no advantage to doing mid-rise if you have to go through the same lengthy rezoning and planning process. The system doesn’t incentivize building mid-rise. The cost and time investment are the same. As a result, we are left with fewer mid-rise developments which is unfortunate because it is a great form of urban housing.”
- “In California, if you’re doing a residential or mixed use, they would call it a residential use permanent and that is your zoning, official plan, secondary plan, site plan and building permit all in one application.”
- “The current process is not working. We are going into third or fourth rounds of submission and getting new comments on new things each time. Can the city work better to get projects completed collectively and in partnership? It has everything to do with leadership and dynamics at the city.”
- “Over the course of my career, I have experienced 10 years of erosion of collaboration and trust between the public and private sectors. It does seem to be an increasingly adversarial position.”
- “We were about to launch a community to go to sale in a week. We’ve been in the planning process for three years. We had everything lined up in terms of timeline and approvals, but when we went to pull a permit which would have required shutting down the road for six weeks, the councilor stopped us and said, ‘You can’t do this.’ So, we spent the last month chasing our tails to find some solutions.”
- “Municipalities set urban design guidelines for floor plate size, tower separation, and architecture and say they’re based on factors like wind, sunlight, and privacy. Yet, they require us to pay for consultant reports to justify the same guidelines they are making us build. If we follow their directives, shouldn’t that be sufficient?”

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## UNCERTAIN POLICY LANDSCAPE COMES AT A COST

Participants highlighted how frequent policy changes, even if positive, can have a negative effect on the industry's capacity to build.

They highlighted that the current landscape of economic uncertainty and shifting government policies is significantly increasing costs and undermining confidence in the industry. Many expressed that a lack of clear direction and recent policy reversals, most notably the municipal urban boundary expansions approved and then rescinded by the province, have created an environment where long-term planning feels risky and unreliable. This uncertainty, compounded by inconsistent approaches across different levels of government, has left many firms hesitant to launch new projects or to look at other jurisdictions as places to invest.

Participants voiced frustration with what they perceive as a lack of understanding by government officials of the development sector's complexities and risks. Major policy shifts and a lack of coordination between federal, provincial, and municipal governments often result in firms needing to adjust plans mid-project, driving up costs and timelines.

This uncertain and sometimes adversarial landscape is seen as a major barrier to increasing housing supply. Participants emphasized that unless there is a more stable, coordinated regulatory environment, the added costs and risks will continue to deter new developments or shift investment elsewhere.

**The frequent policy changes create uncertainty. We're hesitant to invest in projects without knowing how new regulations might impact our bottom line.**

- "From a development perspective, we have seen more changes in the past six years than I think we've seen in the past 20 years. A number of changes that have occurred over the past few years have been challenging for the sector."
- "The constant policy changes make it difficult to plan long-term. We're hesitant to start projects because regulations could shift mid-build."
- "CMHC's recent changes to their Select program, which put more emphasis on affordable units, are an example of a policy shift that creates uncertainty. While I understand the reasoning behind it, these abrupt changes make development even riskier, especially for smaller and mid-sized developers who don't have the capital to absorb these shifts."
- "One of the biggest barriers is the lack of partnership between the public and private sectors. We've been screaming about the housing crisis, but the people who are implementing the policies don't really understand the economic feasibility of building housing. There's a disconnect between the people making the rules and those who are trying to build."

- “How are we supposed to complete a \$100-million land purchase through our board and investors when the last time they were asked to do so, the money went down the drain because the province changed its mind on urban boundaries again?”
- “It boggles the mind how much guessing the government does because of mistrust of developers. If this was any other industry, say farming, the government would work together with the industry to achieve the best outcome. If the issue is trust, the government could have a department of ex-private sector developers to fill in the much-needed knowledge gap.”
- “Any DC rebate, or federal funding, starts to see the benefit go away as we start to see environmental requirements increase, which makes them no longer as financially attractive as they were in the past.”

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## STRATEGYCORP’S PERSPECTIVE

The non-financial barriers to getting housing built are often as significant as the financial ones. It is quite clear that frustrating planning processes and constantly shifting regulations are putting a damper on housing construction. Tackling this challenge while protecting the critical role planners play in city-building is complex, but there are reasons for optimism

that things can be better. There are many tools governments can employ to streamline approvals processes and leave the industry with clear long-term goal posts which have little, if any, cost attached to them.

One idea raised by participants that we consider worth further investigation is the concept of a universal planning application. In principle, this concept calls for the planning system to offer applicants a single planning window through which they can submit one or a series of rolling submissions to cover all their necessary approvals, including official plan, zoning bylaw, site plan and any others. In a best-case scenario, these applications would be managed as a single, multi-layered application through one case manager who could share progress and comments through a digital platform allowing input and dialogue from all parties. Requiring all comments to be submitted through a single platform would eliminate much of the duplication or contradiction often found in the current system.

An additional suggestion is that municipalities promote planning and architectural excellence by incentivizing the use of expert design review bodies, rather than making them an additional layer of the process. They could do this by eliminating the requirement to address comments by urban design departments that would cover the same aspects as a design review body – and likely produce conflicting requirements. Further, municipal guidelines should be designed



to reduce the study requirements of an application. If a proposed development conforms to a design guideline it should be exempt from needing to produce studies on subject matter that is already supposed to be addressed through the guideline.

This streamlining would materially improve the relationship between municipal officials and the development community, reduce friction in application work, and provide clarity to all sides about progress. Guaranteed response timelines or limits to the number of rounds of comments from departments on non-core issues would make this work even better.

Aside from these more transformative changes, we agree that the development industry is right to call for a multi-year pause on other rule changes to give the sector time to get back on its feet financially and adapt to the many changes in recent years. While the majority of the policy changes were viewed by participants as positive and done with the goal of unlocking more housing development, the pace of change has been intense.



## Policy and Program Prescriptions for Government

Despite housing being a top political issue in the past two to three years, there are clearly many more ways that government actions and policies could better support new home development. Each level of government has levers it can pull and a role to play in solving the crisis. At this time, it appears that voters remain hungry for solutions and are not yet satisfied with the outcomes – housing remains relatively unaffordable, housing starts are down, and there is no relief on the horizon. More and bolder action to support the industry is required.

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### WHAT WE HEARD

Participants stressed that streamlining municipal approval processes and reducing red tape would help developers manage costs and timelines more effectively. Faster and more predictable approvals, supported by adequately funded planning departments, would reduce financial strain on projects and enable developers to invest more in other community benefits and priorities.

At the federal level, participants expressed that, while some policies are helpful, a broader approach to support all housing types — rental, condos, and mid-density

options — would better address the full range of housing needs.

Participants agreed that simplifying regulatory requirements, deferring fees, and aligning incentives with housing needs would make projects more feasible. Consistent and stable policies, they argued, would help the development sector meet housing demand more effectively and support broader housing supply goals.

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### SPEED UP APPROVALS PROCESS

Nearly all participants emphasized the need to improve and streamline the municipal application process, highlighting uniformity and predictability as key elements. Participants explained that delays in approvals add significant time and cost, often threatening end-user affordability or even project feasibility. The main culprits for the slow or unpredictable approvals process were the number of layers, people, and steps involved to obtain approvals.

Additionally, turnover in planning department staffing was seen as a source of disruption, with high turnover cited as a reason for conflicting comments and re-negotiating previous understandings that may not be acceptable to a new reviewer.

Almost all participants suggested a faster, more consistent approvals process would reduce financial strain and enable developers to bring housing to market more quickly, addressing supply and affordability challenges.

**“Fund municipalities better to get faster approvals. City planners are the biggest gatekeepers in the process.”**

**“Streamlining the approval process would help immensely. The delays are often unnecessary, and it’s costing everyone.”**

- “There’s random stuff that municipalities like to throw in front of projects they don’t like.”
- “The city needs to get out of its own way. We have hired extremely qualified consultants, engineers, designers, and architects to execute on these projects, just to have the city try to put their own stamp on things, when, respectfully, they don’t have the knowledge we have on our team.”
- “Municipalities should also consider allowing more flexibility in their planning timelines. If projects could move through approvals faster, it would save developers millions in interest payments and allow us to invest those savings into affordable units or other community benefits.”

- “Municipalities should focus on fixing the approval process. It’s interminable. Even with the ‘Build More Homes Faster’ push, we haven’t seen any meaningful changes. The process is bogged down by endless back and forth between different departments.”

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## COORDINATION WITHIN AND BETWEEN ALL LEVELS OF GOVERNMENT

Participants highlighted how a lack of coordination between federal, provincial, and municipal governments creates significant challenges, often reducing the effectiveness of incentives or funding programs.

Many shared experiences where a rebate or subsidy offered by one level of government was effectively cancelled out by new requirements or costs imposed by another, diminishing the intended financial relief. This fragmented approach not only raises costs but also adds unpredictability, making long-term planning difficult.

The continued presence of the mortgage “stress test” was highlighted as an example where one policy imperative (a robust banking system) conflicts with another – supporting home ownership – particularly among first time homebuyers.

Participants also expressed that frequent, sudden policy changes from any government level, either due to political headwinds or any anticipated changes of governing party, further complicate project timelines and budgets, deterring investment and delaying housing supply.

**The lack of coordination between all three levels of government is a real challenge.**

**It has been a challenging couple of years with all the changes from the provincial government. It's been a bumpy road with the number of policy changes to keep up with, which has been quite inefficient.**

- “Governments should incentivize the creation of the thing they want to see more of.”
- “We're hesitant to start projects because regulations or incentives could shift mid-build.”

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## **SUPPORT FOR ALL TYPES OF HOUSING**

Some participants expressed appreciation for the funding and support initiatives aimed at purpose-built rentals, noting that these incentives make rental projects more viable in today's challenging market.

However, they also emphasized the need for a broader approach that includes support across the entire housing sector. Developers pointed out that while purpose-built rentals address an important part of the housing shortage, different types of housing – such as affordable ownership options, mid-density, and family-oriented homes – are also essential to meet the varied needs of communities.

**The federal government has done some helpful things for certain types of housing, but they need to do helpful things for other types of housing as well. We need 3.9 million houses in Canada and there's fewer houses being built in this past quarter century. You need condos. You need the rentals. You need the missing middle.**

- “There has been a big push in municipalities toward purpose-built rentals, which is good, but I also worry if we are doing a bit of a disservice to people trying to build their equity and have some type of long-term financial stability.”
- “The stress test has overstayed its welcome in this high-interest environment. Buyers are either unable to qualify or simply opt to wait. First-time buyers in particular face an uphill battle due to lack of incentives.”

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## FREQUENTLY UNCLEAR DIRECTION FROM MUNICIPAL PLANNERS

Participants raised concerns about the inefficiencies and inconsistencies in the municipal planning process, highlighting the role of planners as a critical point of frustration. Many felt that due to workload or internal politics, planners in high-growth municipalities are often acting as “circulators,” passing applications through various departments and collating comments rather than providing clear, decisive feedback to applicants. This process often results in conflicting or contradictory comments from different municipal departments, leaving developers uncertain about which requirements or perspectives to prioritize.

Some participants shared specific examples where feedback appeared copy-pasted rather than genuinely analyzed, raising doubts about the rigour of the review process. Others noted that, when planners encounter conflicting policies or feedback on non-planning matters, planning staff often defer to their colleagues in other departments.

This perceived tendency to avoid decision-making or prioritization of issues creates bottlenecks, adding time and cost to projects. Participants also noted that even site plan circulations are now taking longer to get through, and second or third circulations find “new” minor issues rather than confirming that previously identified issues have been resolved.

Participants emphasized that planners, given their expertise, should have the authority to make judgment calls on policy interpretations or conflicting viewpoints instead of deferring decisions to colleagues in other departments with differing perspectives. This approach, they argued, would streamline approvals, and provide a clearer, more predictable path for projects to move forward.

**“Planners are not being used as effectively as they should be. They are educated, understand policy, and city vision and goal, but are just being passed through and being used in the way that admin staff could be used. The planner should be working in partnership, not as a gatekeeper.”**

- “At the provincial level you need to look at rewriting a combination of the Planning Act and City of Toronto Act to create a more effective system of housing.”
- “The province needs to be more strong-armed. They have been ok at getting some strong bills out but there is also stuff that needs to go, like parking minimums and some aspects of Bill 185.”
- “Political oversight and lack of connecting the dots is frustrating. We do everything the staff asks of us. We don’t go to the market too early, we plan everything, and then at the 11th hour, there’s political interference. And it doesn’t change the outcome, they just get a local win in their back pocket.”

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## STRATEGYCORP'S PERSPECTIVE

Those we spoke with have worked in housing construction, development and planning their entire careers and have seen shifts in public perception of the development industry, as well as the level of professional collaboration between the public and private sectors. Ultimately, the public will benefit from a more collegial relationship between residents, governments, and developers. Understanding that we are all rowing the boat in the same direction (decrease cost of living) and trying to reconcile differences of opinion about how to get there is important to tackling the housing crisis.

Residents need to be able to look past their individual interests and realize that developers are responding to a demand that is invisible to those comfortable in their current housing arrangement.

Decision-makers need to understand that margins are often thin for developers, and they are not a bank with unlimited resources to provide all the infrastructure benefits and

improvements they want. More incentive-based programs and funding can be made available to prioritize the types of housing people want to see built.

Municipal staff need to allow planners to be planners and control applications and approvals, as opposed to the fragmented review process which often takes too much time, resulting in carrying costs that move projects closer to unviability.

All governments need to contribute to an equitable way to build the infrastructure to support housing growth, without relying so heavily upon the private sector.

If all stakeholders can play their part, we can expect to see better government and policy support for tackling the cost of living and housing affordability crisis.

A more comprehensive support strategy would help ensure that housing options are available for people at different stages of life and income levels, creating a balanced and inclusive housing landscape.





## The Public Builder Concept and Alternative Development Models

Our conversations also examined the role of public sector involvement in housing development, discussing models that could effectively address current housing challenges. Participants considered the idea of a “public builder” model, where developers could potentially partner with municipalities to deliver affordable housing, exploring both the opportunities and challenges of such an approach. The discussion also touched on what municipal leaders need to consider for successful public-private collaboration. Finally, participants shared their vision of an ideal municipal housing model, highlighting effective strategies, required leadership, and actions that smaller municipalities could take to encourage housing development.

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### WHAT WE HEARD

StrategyCorp asked participants about their perspective on the municipality taking a more active role in building housing. This concept, referred to by some as a “public builder model,” sparked a range of responses from participants who shared both their views on a stronger government presence in housing and their advice for politicians considering such an approach.

While some acknowledged the potential benefits of public sector involvement, many participants were wary about municipalities directly leading housing projects. They expressed concerns that the public sector may lack the specialized expertise needed for effective project management.

Instead, most participants suggested that municipalities focus on creating an enabling environment for private developers, where streamlined approvals, supportive policies, and contributions of surplus lands would help accelerate and amplify housing delivery.

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### SIGNIFICANT SKEPTICISM TO MUNICIPALITIES LEADING HOUSING DEVELOPMENT PROJECTS

Participants overwhelmingly expressed reservations at municipalities’ ability to build housing itself. StrategyCorp also asked developers about their openness to the idea of becoming a contractor for a municipal government and about the approaches and challenges with this approach. Most participants understood why a municipal government may see this as the most direct route to getting housing built but suggested that the top-level talent required to lead a robust “public builder” agency was out of virtually every Ontario municipality’s reach.

- “I’m skeptical. The public sector doesn’t have the expertise to lead this kind of development. They need to work with private developers to make it happen efficiently.”
- “The idea of the City of Toronto getting into the business of building housing is laughable. Bureaucrats aren’t efficient at building or development. They would need to hire experts from the industry and treat them as a for-profit operation. Otherwise, it’s bound to fail as it did in the past. There are better ways to incentivize housing than having the city become the builder.”
- “If the city has the money, they can go buy these projects outright. They know about the units that got stuck and couldn’t get off the ground because they have given approval from them.”
- “Do I think the city being a builder is a good idea? No, I think that’s the worst idea in the world.”
- “I think the idea is noble in theory, but the track record hasn’t been great.”
- “The city should focus on its policy and land pricing. The best thing they could do is create the right conditions for private developers to build by addressing the cost of land and keeping government-imposed costs in check.”

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## PUBLIC PRIVATE PARTNERSHIP ALTERNATIVES

Some participants suggested public-private partnerships as the model to follow. Under this model, the municipality would provide land, resources or funding, or would purchase units outright in presales, providing developers with the prerequisites to get financing and ultimately turn that equity into affordable units in the market.

**Public-private partnerships would be ideal. The city can provide land or other incentives, and developers can bring their expertise to execute projects efficiently.**

**It could be a solution, but only if they partner with private developers. Otherwise, it could just add more layers of bureaucracy without addressing the root issues.**

- “If it’s structured right, it could work. Public-private partnerships are key. The government brings land, and we bring the expertise to build efficiently.”
- “A public builder model could work if the city offers incentives to private developers to share the risk. It needs to be a collaborative effort.”



- “I think it’s fantastic the city is getting back into building housing. There has been a lack of diversity in the industry and adding the public and non-profit sectors will help address that. I’m all for the city building its capacity to do this.”
- “The risk with the city becoming a builder is that public sector projects often cost significantly more than private sector ones. If the city were to take on full responsibility for building, we’d see costs balloon because of the layers of bureaucracy involved. The city needs to lower its criteria and allow private sector efficiencies to drive down costs.”
- “If we went to the city and said, ‘We have this idea, we want to build this project, we want to take our DCs and rather than give it to you, we’re going to give our DCs to our affordable housing provider and they are going to use that as equity,’ they should be ok with that.”

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## STRATEGYCORP’S PERSPECTIVE

While the concept of a public builder was not popular with our participant group, it surfaces an important truth and even more important discussion. It is clear that there are lots of

things that governments at all levels can do to make progress against the current housing crisis and dire state of the development industry, including financial contributions in some form. We agree with this – the scale of the crisis is too severe for governments to keep their financial resources on the sideline.

The broader question for each level of government to determine is given the limited resources they each have, which spending priorities in this area will lead to the best outcomes for housing supply?

The City of Toronto has tried to maximize value on several sites they own in the past through the Housing Now program. Since Housing Now began in January 2019, the City has included 22 properties across Toronto that are estimated to produce over 15,000 new homes with over 5,000 being affordable rental homes. They did this through upzoning land, including specific conditions to their sale and construction, and then putting the properties out to RFP. If the City of Toronto can expand eligibility for this program and use their powerful ability to rezone more lands, this creates substantial opportunity for Toronto to become a builder in the less literal construction sense of the word, and more so as a leader of industry.



## Conclusion

The development industry is worried about the lack of housing being built and the slow pace of construction and sales. Interest rate cuts will only go so far and not solve all the problems of the sector. A shift is needed from all levels of government alongside a collaborative attitude to get housing starts from plans to construction. Getting construction cranes in the sky is a long process and their presence in 2024 is a look in the rearview mirror, not a sign of what is happening, or what is to come.

As of December 2024, new home sales across the province continued to decline, year over year, with the biggest impact on the condominium sector. High interest rates and costs have resulted in weaker buyer demand, and in turn impacting the ability of new housing starts.

Since housing starts are the housing supply of tomorrow, the longer that sales remain low the more it is expected that available housing in the 2027-2029 time period will suffer. This is going to result in limited supply in the next few years, resulting in increased competition putting upward pressure on prices, as demand outstrips supply.

This is why it is integral for all levels of government to take big policy swings to address the extent of the housing crisis and shift restrictive policies away from the only industry – homebuilders – that can solve it.



# Our Land and Infrastructure Development Practice

## StrategyCorp Brings Unparalleled Experience to Your Development Projects

StrategyCorp has deep expertise in the business of land development, supporting our clients from ideation through construction permitting. We have unique and unrivalled political acumen, are strong public engagement managers, and experts in strategic communication.

We are specialists in municipal government, getting projects unstuck and making things happen at City Hall. When working with StrategyCorp you can be assured that no opportunity will be left unexplored, nor issue unresolved.

## StrategyCorp Knows Planning is Political

Understanding the local political landscape and how to use engagement to navigate it is a critical ingredient in land development approvals. No matter how good you feel the project is, sometimes progress doesn't happen because of politics. You need someone who understands the challenges and knows how to engage. Thinking politically about planning ultimately saves time and therefore, money.

## Our Interdisciplinary Teams Have a Wide Range of Perspectives

When partnering with StrategyCorp, you work with people who have a diverse set of political and public service backgrounds, stretching across all government jurisdictions; federal, provincial, and municipal. As a pan-partisan team, every project will have a variety of political views enriching the process, ensuring every angle and opportunity is being considered. This approach allows our team of experts to have a deep understanding of political environments, planning policy landscapes, and development approvals processes in municipalities across Ontario.

## An Experienced Team

Our growing team of more than 85 people in Toronto and Ottawa includes some of the best-known actors in public administration, including former City Managers and CAOs, Assistant Deputy Ministers, Chief Planners, and former political advisors to Premiers, Ministers, Mayors and Councillors. Learn more about our team at [strategycorp.com/about/people](https://www.strategycorp.com/about/people).

## StrategyCorp Supports All of Your Development Needs

Our Land and Infrastructure Development Team has worked to support our clients with a wide and growing range of planning needs. Knowledge of municipal planning regulations and processes, strategic community outreach, and identifying and aligning development proposals with broader transit goals (including Transit Oriented Communities) to unlock greater planning permissions, are only brief examples of the wide range of experience StrategyCorp. Our team's multi-faceted skills can help clients address their problems and achieve their goals.

## Our Services:

- Municipal Planning Approvals
- Provincial Planning Approvals
- Strategic Planning
- Community and Stakeholder Engagement Strategies
- Transit Oriented Development
- Indigenous Engagement Leadership
- Implementing and Educating Clients on Strategic Policy Changes
- Strategic Communications and Issues Management
- Government Relations for Community Infrastructure Investment

## For Further information



**CONTACT:**

Land and Development Infrastructure Practice  
[agrovewhite@strategycorp.com](mailto:agrovewhite@strategycorp.com)

For more information about StrategyCorp and our other areas of practice,  
see [www.strategycorp.com](http://www.strategycorp.com)

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**SUBJECT:** Pipeline to Permit Committee Accomplishments and Terms of Reference Review  
**TO:** Pipeline to Permit Committee  
**FROM:** Legal and Legislative Services  
Legislative Services

Report Number: LLS-19-25

Wards Affected: All

Date to Committee: February 13, 2025

Date to Council: February 18, 2025

CIP Date: N/A

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### **Memo Details**

The purpose of this memo is to provide an opportunity for Pipeline to Permit (P2P) Committee members to review the terms of reference, reflect on the progress made in the first year, and discuss plans for future meetings and actions.

The P2P Committee was established to address the housing crisis and streamline the approval process for new housing units, supporting the city's goal of 29,000 units by 2031. The committee was endorsed by city council on October 17, 2023, and its terms of reference, attached as Appendix A to legislative services memo LLS-18-25, was approved on November 2, 2023.

The committee, composed of both council members and community stakeholders, held its first meeting on February 8, 2024. In its inaugural year, the committee hosted presentations from various stakeholders and engaged in discussions about initiatives to improve the housing approval process.

In 2024, the P2P committee heard presentations and engaged in discussion on the following:

- Project Amplify, Orbis Dynamics - an approach to urban design and development, leveraging best practices & professional experience in smart city urban design, digital twin and system dynamics simulation technologies (03/24)
  - [Recommendation from P2P Motion memorandum regarding the Preparing Burlington for the Future \(PP-05-24\) passed by Council on Mar. 19, 2024](#)

- Development Bonds, Marsh Canada Limited (03/24)
  - [Recommendation from P2P presentation Surety Bonds \(PP-06-24\), passed by Council on Mar. 19, 2024](#)
- Legislative and regulatory changes affecting Conservation Halton's (CH) development permitting, Conservation Halton (04/24)
- Permit and application streamlining update (04/24)
- Development Services process overview, City of Burlington (05/24)
- Live BI Dashboard (Open Data) providing housing data (i.e. number of housing units, foundation starts), City of Burlington (06/24)
- Housing starts landscape and survey methodology, Canadian Mortgage and Housing Corporation (09/24)
- Staff update regarding Provincial government final version of the provincial planning statement. (09/24)
- Youth Skilled Trades Tiny Home Program, Habitat for Humanity. (10/24)
- Housing Accelerator Fund (10/24)
- Integrated Master Plan status update (water, wastewater and transportation), Halton Region (11/24)
- Building permit application resubmissions, City of Burlington (11/24)
- Monthly review of the Pipeline to Permit self-serve online dashboard showing the city's progress in reaching building permit and planning approval targets, City of Burlington (ongoing)

In 2024, the P2P Committee also discussed and provided input on:

- Building Faster Fund, Ministry of Municipal Affairs and Housing
- Early assignment of municipal addressing for new residential properties
  - [Recommendation from P2P Motion Memorandum regarding process review of municipal addresses for new residential homes \(PP-07-24\) passed by Council on Apr. 16, 2024](#)
- Action plan to meeting Burlington's housing targets
  - [Recommendation from P2P Motion Memorandum regarding action plan to meet Burlington's housing targets \(PP-08-24\) passed by Council on Apr. 16, 2024](#)
- Impacts of demographic changes impacting built form characteristics and development of complete communities to 2051
- Action plan for the achievement of housing targets
  - [Recommendation from P2P Motion Memorandum regarding understanding the future characteristics of Burlington \(PP-14-24\) passed by Council on May 21, 2024](#)

- Alignment of data definitions, survey processes and protocols between the City of Burlington and Canada Mortgage Housing Corporation
  - [Recommendation from P2P direction regarding collaboration with Canada Mortgage and Housing Corporation to ensure alignment in housing start data \(SD-15-24\) passed by Council on Sept. 17, 2024](#)
  - [Collaboration with Canada Mortgage and Housing Corporation \(CMHC\) to ensure alignment in housing start data \(BB-06-24\) passed by Council on Nov. 19, 2024.](#)
- Resubmission of building permit applications
  - [Recommendation from P2P Motion Memorandum regarding resubmissions for building permits \(PP-21-24\) passed by Council on Sept.17, 2024](#)
  - [Recommendation from P2P regarding resubmissions for building permits passed by Council on Nov. 19, 2024.](#)

The Committee also:

- Advocated to Federal Government for GST relief on purpose-built rental housing and energy efficient measures for new development.
  - [Recommendation from P2P Motion Memorandum regarding call to federal government for GST relief on purpose-built rental housing and energy efficient measures for new development \(PP-13-24\) passed by Council on May 21, 2024](#)
- Initiated and approved a pilot program approach to accepting Pay-on-Demand development bonds, including a pay-on-demand template and policy.
  - [Recommendation from P2P report Pay-On-Demand Development Bonds \(F-13-24\) passed by Council on Jun. 18, 2024](#)

The Pipeline to Permit (P2P) Committee discussed and provided input on several key initiatives aimed at improving the development process, from application to occupancy. Discussions included ways to streamline the process, improvements in coordination and communication between various stakeholders, and improvements to tracking and reporting. This input was aimed at refining policies and procedures to help accelerate the pace of housing development in line with the city's goals.

The attached terms of reference document outlines the Pipeline to Permit (P2P) Committee's purpose, approach, guiding principles, and responsibilities. The terms of reference are to be reviewed one year after the committee's commencement and then at least once per term of Council. In line with this requirement, the first review is scheduled for February 2025. This review will offer the committee an opportunity to assess the effectiveness of its approach and make any necessary adjustments moving forward.

**Author:**

Lisa Palermo  
Manager, Committee Services/Deputy Clerk  
[lisa.palermo@burlington.ca](mailto:lisa.palermo@burlington.ca)  
905-335-7777 x7492

**Attachments:**

A. [Pipeline to Permit Committee Terms of Reference, approved Nov. 2, 2023](#)

**Memo Approval:**

All memos are reviewed and approved by the Commissioner, Head of Corporate Affairs, Chief Financial Officer, and Commissioner of Legal and Legislative Services/City Solicitor.

## **PIPELINE TO PERMIT COMMITTEE TERMS OF REFERENCE**

**NAME:** Pipeline to Permit Committee  
**CLERK:** Committee Clerk  
**REPORTS TO:** City Council  
**REFERENCE:** CM-15-23 and MO-01-23

### **PURPOSE**

On March 21, 2023, City Council accepted the Province of Ontario's housing pledge for 29,000 units to be built in Burlington by 2031. The Pipeline to Permit Committee (the Committee) will focus on tracking growth, issues, and continuous improvement opportunities for the development approval process within the City of Burlington, recognizing overarching legislative planning requirements and any other relevant regulations. The Committee will take an informed and analytical approach to the current procedures and development approval processes that affect the way businesses, residents and developers move through the development processing system. The Pipeline to Permit Committee (P2P) will make recommendations to Council to ensure the timely and efficient issuance of development approvals and building permits for residential and commercial customers to enable the development of Complete Communities.

Report MO-01-23 outlined the significant financial implications if Burlington's housing pledge is not realized, including but not limited to:

- Maximizing funding from the Building Faster Fund
- Opportunity for new property tax assessment growth
- Avoiding Planning Act application fee refunds if applications aren't processed within legislated timelines
- Additional revenue associated with growth

### **APPROACH**

The Committee will work collaboratively with staff to help refine the development process, from application to occupancy. Fulfilling the Provincial housing pledge is paramount; however, the City of Burlington also recognizes the need to accommodate growth, by increasing housing availability of all forms including affordable and attainable housing.

## **GUIDING PRINCIPLES**

To achieve its goals the Committee will adopt the following guiding principles when approaching its work:

### **Quality Customer Service:**

The development review process must be transparent with expectations clearly and respectfully communicated. Overall, the process must be seen to be fair. Positive customer experiences will contribute directly to improved brand reputation for the City.

### **Efficiency and Timeliness (“Time is Money”):**

Inefficiencies in the process and any resulting delays represent additional costs in time and money both to the applicant and to the departments/agencies involved in the process.

### **Public Interest:**

In its consideration of matters before the Committee, the Committee will ensure the public interest in health and safety is maintained through required development engineering and building permit review.

### **Easy and Accessible Navigation:**

Applicants and other stakeholders must have easy access to up-to-date and clearly articulated policies/guidelines, consistent rules/interpretations, and organized processes.

### **Complete Communities:**

The enduring goal of the Committee’s work is to enable development of complete communities and high quality of life for the next seven generations, and beyond, including housing, jobs, shops, services, community amenities and greenspace, transportation choices, affordability and inclusivity.

## **COMMITTEE RESPONSIBILITIES**

The Pipeline to Permit Committee shall make recommendations directly to Council on the following:

### **Process:**

- Explore opportunities to improve processes and timelines in the issuance of development approvals and building permits in the City of Burlington to support its housing pledge to the Province, and the issuance of non-residential permits to support business development and economic growth.
- Recommend guidelines for applicants to promote quality applications.
- Review and provide comments on development metrics including but not limited to, setting or revising service standards, objectives and related key performance measures (KPIs).
- Compare and provide comment on processing timelines through jurisdictional scans and review of leading practices from comparable municipalities.

- Review development services processes and related policies and procedures within the City of Burlington from the point of initial application through to occupancy.
- Recommend procedure updates or amendments using data and analytics to ensure an efficient development approval and building permit process.
- Develop and recommend processes, procedures, guidelines, and measurable objectives, to enhance overall customer experience.

**External Agencies:**

- Increase collaboration and synergy with external agencies to ensure more timely and integrated responses to development application circulations.
- Recommend strategies to achieve compliance with response deadlines by external agencies.
- Investigate opportunities for the City to be provided delegated approval authority from external stakeholders.
- Work with external agencies to ensure mutual understanding of the development review process, clear roles in the process, timing expectations and applicant needs.
- Develop strategies to foster stronger relationships and ongoing collaboration with external review agencies.

**Resources:**

- Recommend additional human, technology and other resources required to achieve recommended processes and procedures changes.

**Technology:**

- Review and report on leveraging digital transformation opportunities, such as integrated process and workflow management systems for development applications, application of artificial intelligence or other advanced technology enhancements.

**Oversight:**

- Receive and provide comment on monthly reports detailing the status of applications by type and progress of permit approvals for all housing and commercial units in Burlington’s development pipeline.
- Review and provide comment on the *Red Tape Red Carpet Task Force Reports*, with the intent to incorporate applicable findings towards issuing development approvals and building permits more efficiently.

**Government Relations:**

- Receive periodic reports on pending application status for upper-level government development related funding programs.
- Identify and provide input on appropriate advocacy opportunities to upper levels of government, on development matters.

**Engagement:**

- Receive input from the public and the development industry by way of delegations and correspondence regarding processes, procedures, and intergovernmental advocacy.

**COMMITTEE COMPOSITION**

The Committee is comprised of thirteen (13) members, one vote per member:

- Four members of Council:
  - Mayor
  - Three members of Council, ideally tied to relevant Deputy Mayor portfolios
- One representative from non-profit housing association
- One representative from Halton Region housing division
- One representative from Conservation Halton
- One representative from West End Home Builders Association (WE-HBA)
- One representative from Building Industry and Land Development Association (BILD)
- One Planning Professional from a consulting firm, that does business in Burlington
- Three public member representatives

The Co-Chairs will be Mayor Marianne Meed Ward and a member of Council determined by Council resolution.

All members of Council are invited to attend meetings and may be recognized by the Co-Chairs to speak. If in attendance, they will not be counted towards quorum purposes or be allowed to present motions or vote on matters before the Committee. Motions may only be presented by a member of the Committee.

**City staff to support as follows:**

Subject to the agenda items the following staff supports may be required:

- City Manager
- Executive Director of Community Planning Regulation & Mobility and relevant staff in development services
- Executive Director of Environment Infrastructure & Community Services, and relevant staff involved in development matters
- Executive Director of Strategy, Risk and Accountability, and relevant staff with subject matter expertise on process improvement, continuous improvement, performance measurement, as well as government relations
- Executive Director of Community Relations & Engagement
- Executive Director of Legal Services and Corporation Counsel
- Executive Director & Chief Financial Officer
- Executive Director – Burlington Digital Services and Chief Information Officer
- Executive Director - Burlington Economic Development
- Burlington Lands Partnership - Executive Lead

## **TERM OF OFFICE**

The Mayor is a member of Committee as of right.

Councillors are appointed by Council resolution, with a term specified. Where possible, appointees will be considered based on their Deputy Mayor portfolios.

Non-Council members shall be appointed in accordance with the City's Public Appointment Policy. The term of office is two years. The term limit is three consecutive appointments or six years served.

Where a member ceases to be a member before the expiration of their term, Council will appoint another eligible person for the remainder of that appointment term.

## **MEETINGS**

The Committee is expected to meet monthly as part of the standing committees meeting cycle. Meetings are anticipated to be approximately two hours.

Additional meetings are at the discretion and the call of the Co-Chairs.

The Committee will operate according to established Standing Committee process, with the following exemptions:

- Non-members of the Committee may be permitted to speak upon recognition by the presiding Co-Chair.
- Open discussion will be allowed in advance of motions being moved.
- No member shall speak for more than five minutes at a time.
- All members shall be allowed to speak one time before going to second-time speakers. This also applies to any subsequent rounds of speakers.
- There is no limit on the number of times members may speak to an item.

Subcommittees may be established at the Committee's discretion to carry out additional work. Subcommittee sessions will be informal and neither clerked nor broadcast.

The City of Burlington conducts hybrid meetings, with participants in person and virtually. Members, staff, the public and stakeholders are afforded the opportunity to participate either in person or virtually.

Closed Session items, which meet the test of closed meetings, will be considered in accordance with the City's Procedure By-law and section 239 of the Municipal Act 2001.

## **AGENDA MANAGEMENT**

The Co-Chairs will work with the Committee Clerk to prepare the meeting agenda, in keeping with the City's Procedure By-law. The Committee Clerk will publish the meeting agenda concurrent with the other Standing Committee agendas publication releases. Meeting minutes and webcasting of the meetings will be posted on the City's website.

Members, staff, residents, and other stakeholders will be afforded the opportunity to observe meetings virtually or in-person.

## **ACCOUNTABILITY**

Participants on the Committee and or delegates must understand their roles and accountabilities in relation to the broader municipal development review process. When Committee convenes, all must be aware how actions, interactions, and subsequent recommendations will impact the overall timeliness and efficiencies of the development process.

Members must adhere to the City of Burlington's Code of Good Governance for Council, for public members, they are accountable to the Code of Conduct for Local Boards and Committees. These functions are supported by the City's appointed Integrity Commissioner. Members may also have and be bound by other professional codes of ethics.

## **QUORUM**

Quorum is constituted by the attendance of 50% +1 of appointed members and at least one of whom is an elected member of Council.

## **BUDGET CONSIDERATIONS**

There is no additional cost related to the establishment of the standing committee. Staffing and resources required would be absorbed within existing budgets as part of the normal course of business in the municipality. Should additional resources be identified, these will proceed via recommendations from Committee to Council for approval.

## **REQUIREMENTS AND CRITERIA FOR CITIZEN APPOINTEES TO THE PIPELINE TO PERMIT COMMITTEE**

- Be a resident of the City of Burlington
  - \*\* Representatives appointed in their professional capacity or by membership in an identified organization are not required to be a resident of Burlington.
- Relevant and applicable background or experience such as but not limited to:
  - Housing sector development and building
  - City planning or urban design
  - Land-use economics
  - Architectural and Landscape design
  - Real estate
  - Public policy
  - Performance measurement and continuous improvement
  - Community development
- University/college student in a related post-secondary field such as Architecture, Planning, Business Administration, or Construction Engineering (encouraged to apply)
- All appointed public members must complete a police record search, paid for by the City of Burlington.

**TERMS OF REFERENCE REVIEW DATE:**

A review of the Pipeline to Permit Committee shall be done one year after commencement, then at a minimum once per term of Council.

**Next review by February 2025.**

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**SUBJECT:** 2024 Senior Government Advocacy  
**TO:** Pipeline to Permit Committee  
**FROM:** Office of the Mayor  
N/A

Report Number: MO-01-25

Wards Affected: All

Date to Committee: February 13, 2025

Date to Council: February 18, 2025

CIP Date: N/A

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The purpose of this memo is to provide an overview of City Resolutions, Submissions and Advocacy to Senior levels of Government in 2024. This memo acts as a companion to LLS-19-25 titled “Pipeline to Permit Committee Accomplishments and Terms of Reference Review”. Together the memos provide an opportunity to reflect on progress made in 2024 and to support a discussion to identify key gaps, opportunities and actions for 2025.

As part of its mandate, the Pipeline to Permit (P2P) committee studies and reports to Council on a range of policy, process, and partnership matters related to housing supply and housing affordability. Given the current Provincial election and given the prospect of an imminent Federal election, it is important to have a discussion with the Committee to seek ideas, to be presented for Council’s consideration, related to advocacy opportunities.

LLS-19-25- Pipeline to Permit Committee Accomplishments and Terms of Reference Review provides an overview of presentations and discussions undertaken at Committee and consolidates Motion Memorandums and Recommendations passed by Council.

Attachment A contains a compendium of all City resolutions, submissions, and other advocacy materials that interface with the P2P mandate that were generated in 2024.

This information will offer the committee an opportunity to discuss progress on key issues as well as to discuss key gaps and opportunities for advocacy in 2025.

**Author:**

Marianne Meed Ward, Mayor

**Attachments:**

A. Resolutions, Submissions and Advocacy to Senior Levels of Government

Approved as per form by the City Clerk

## MO-01-25 Appendix A

### 2024 Pipeline to Permit Related Advocacy Activities

#### Committee Motions and Correspondence

- April 11, 2024 [Motion Memorandum regarding action plan to meet Burlington's housing targets for 2024](#)
- April 11, 2024 [Motion Memorandum process review of municipal address for new residential homes](#)
- May 16, 2024 [Motion Memorandum call to federal government for GST relief on purpose-built rental housing and energy efficient measures for new development](#)
- May 16, 2024 [Response to Minister Calandra – Burlington's housing targets for 2024 and 2025](#)
- May 16, 2024 [Motion Memorandum Understanding the future characteristics of Burlington and its implications to development in the future](#)
- June 13, 2024 [Enaction Pay-On-Demand Development Bonds](#)
- September 12, 2024 [Motion Memorandum Resubmissions for Building Permits](#)
- September 12, 2024 [Direction regarding collaboration with Canada Mortgage and Housing Corporation to ensure alignment in housing start data](#)
- October 10, 2024 [Correspondence from the Honourable Sean Fraser, P.C., M.P., Minister of Housing, Infrastructure and Communities regarding housing starts](#)
- November 7, 2024 [Enaction on Pay-On-Demand Development Bonds Policy](#)
- November 7, 2024 [Motion Memorandum Endorse the Pipeline to Permit Committee Co-Chairs to share building and by-law department report BB-06-24 regarding collaboration with Canada Mortgage and Housing Corporation \(CHMC\) to ensure alignment in housing start data, as well as any additional insights to the Minister of Municipal Affairs and Housing and copy relevant officials](#)

#### Advocacy Activities

##### Association of Municipalities Ontario (AMO) Conference August 2024

- Delegation with Parliamentary Assistant to the Minister of Municipal Affairs and Housing, Matthew Rae
  - Ensuring Accurate and Timely Housing Data to Inform Policy & Funding Decisions (Attachment 1)

##### Rural Ontario Municipal Association (ROMA) Conference January 2025

- Delegation with Parliamentary Assistant to the Minister of Municipal Affairs and Housing, Matthew Rae
  - Ensuring Burlington's Development Horizon Through Flood Mitigation (Attachment 2)

### Ontario Big City Mayors

- [February 2024 Meeting with Minister of Finance, Peter Bethlenfalvy](#)
  - The creation of a sustainable funding program so municipalities can deliver the housing enabling infrastructure needed to meet the province's housing targets;
  - Concerns were also raised with the criteria for qualifying for the Building Faster Fund. Measuring housing starts using foundations poured is outside the purview of municipalities.;
  - There is also the issue that the CMHC data used to count foundations is often inaccurate and undercounts the construction activities in many of our member municipalities.
- February 9, 2024 [Motion Calling for the Province for a Social and Economic Prosperity Review](#)
- February 9, 2024 [Motion on Municipal Infrastructure Bonds in Ontario](#)
- March 21, 2024 [Ontario Big City Mayors Statement on the Province's Announcement of the New Municipal Housing Infrastructure Program and Increased Funding for the Housing Enabling Water Systems Fund](#)
- April 10, 2024 [Ontario's Big City Mayors Statement on Cutting Red Tape to Build More Homes Act](#)
- April 12, 2024 [Ontario's Big City Mayors Statement on Solving the Housing Crisis: Canada's Housing Plan](#)
- June 14, 2024 [Motion on Advocacy for Accurate and Timely Housing Data to Inform Policy and Funding Decisions](#)
- August 8, 2024 [Ontario Big City Mayors Launch "Solve the Crisis" Campaign](#)
- August 18, 2024 [Motion Requesting that the Provincial Government take Action to Address the Growing Health and Homelessness Crisis](#)
- August 18, 2024 [Motion Requesting that the Provincial Government Change the Criteria for Municipalities and Regions to Qualify for the Building Faster Fund](#)
- August 20, 2024 [Ontario's Big City Mayors Attend AMO Conference 2024 to Advocate for Ontario's Biggest Cities](#)
- October 21, 2024 [Ontario's Big City Mayors are Calling on the Provincial and Federal Governments to Take Action on Homelessness, Mental Health, Safety and Addictions](#)

## Staff Reports and ERO Submissions

- February 5, 2024 [Heritage response to Bill 23 – results of consultation on shortlist of designation candidates](#)
  - [Appendix A](#)
  - [Appendix B](#)
- March 1, 2024 Council Information Package Housing Targets and Performance
  - [Letter to Minister Calandra](#) (see item 1)
  - [Minister Response](#) (see item 1)
- March 4, 2024 [Housing Accelerator Fund implementation](#)
  - [Appendix A](#)
- March 4, 2024 [Bill 162, Get it Done Act, 2024 update](#)
  - [Appendix A](#)
- March 15, 2024 Council Information Package: ERO Submission Posting 019-8273 [Comments on proposed amendments to the Official Plan Adjustments Act, 2023 to retroactively reinstate municipally requested modifications to official plans for the cities of Barrie, Belleville, Guelph, Hamilton, Ottawa, and Peterborough, Wellington County and the regions of Niagara, Peel, Halton, York and Waterloo](#)
- April 26, 2024 [Council Information Package: Stormwater Fee Structures](#) (see items 5 and 6)
- May 4, 2024 [Bill 185, Cutting Red Tap to Build More Homes Act, 2024 and the Proposed Provincial Planning Statement, 2024](#)
  - [Appendix A](#) (includes multiple ERO submissions)
    - Proposed changes to the Planning Act, City of Toronto Act, 2006, and Municipal Act, 2001 through Bill 185, the proposed Bill 185, Cutting Red Tape to Build More Homes Act, 2024
    - Proposed Regulatory Changes under the Planning Act Relating to the Cutting Red Tape to Build More Homes Act, 2024 (Bill 185): Removing Barriers for Additional Residential Units
    - Proposed Regulatory Changes to Ontario Regulation 73/23: Municipal Planning Data Reporting
    - RE: Proposed Changes to Regulations under the Planning Act and Development Charges Act, 1997 Relating to the Bill 185, Cutting Red Tape to Build More Homes Act, 2024 (Bill 185): Newspaper Notice Requirements and Consequential Housekeeping Changes
    - Changes to the Development Charges Act, 1997 to Enhance Municipalities' Ability to Invest in Housing-Enabling Infrastructure

- Review of proposed policies for a new provincial planning policy instrument
- September 9, 2024 [PL-76-24 Provincial Planning Statement, 2024](#)
  - [Appendix A](#)
- October 11, 2024 Council Information Package [Review of proposed policies Enabling the Use of Pay-on-Demand Surety Bonds to Secure Land-Use Planning Obligations under Section 70.3.1 of the Planning Act](#) (see item 1.1)
- October 24, 2024 Council Information Package [Environmental Registry Submissions \(ERO 019-9065: Consideration of transition of land use planning matters to facilitate the introduction of a new policy statement issued under the Planning Act; and, ERO 019-9210: Proposed amendment to Ontario Regulation 299/19: ADDITIONAL RESIDENTIAL UNITS, made under the Planning Act\)](#) (see item 1.1)
- November 15, 2024 Council Information Package [Office of the Mayor Marianne Meed Ward: Housing Accelerator Fund; and Office of the Mayor Marianne Meed Ward: Housing Accelerator Fund \(HAF\) Allocation](#) (see items 1.3 and 1.4)
- December 13, 2024 Council Information Package [Response to ERO number 019-9300 Proposal to create a regulation under the Ontario Energy Board Act, 1998 Cost responsibility rules for certain electricity system connection infrastructure](#) (see item 1.2)

## **Funding Applications & Programs**

### Federal

- Canada Mortgage and Housing Corporation (CHMC) [Housing Accelerator Fund](#)
  - Multi-Year Funding, \$5.2M received in 2024
- Housing, Infrastructure and Communities Canada (HICC) [Short-Term Rental Enforcement Fund](#)
  - One-time Funding, application submitted in January 2025
- Housing, Infrastructure and Communities Canada (HICC) [Canada Housing Infrastructure Fund – Direct Delivery Stream](#)
  - One-time Funding, Application Deadline: March 31, 2025

### Provincial

- Ministry of Municipal Affairs and Housing (MMAH) Audit and Accountability Fund
  - One-time Funding, \$250K received in 2024
- Ministry of Municipal Affairs and Housing (MMAH) [Encampment Response Initiative & Last Mile Funding](#)
  - One-time Funding, \$3.6M awarded in 2025 to Halton Region

- \$500K earmarked for Encampment Response Initiative Project at 2404 Queensway Drive in Burlington
- Ministry of Infrastructure (MOI) [Housing-Enabling Water Systems Fund](#)
  - One-time Funding, \$20M awarded in 2025 to Halton Region
- Infrastructure Ontario (IO) [Housing-Enabling Water Infrastructure Lending Stream](#)
  - One-time Funding, Rolling Application Deadline
- Ministry of Infrastructure (MOI) [Health and Safety Water Stream](#)
  - One-time Funding, Applications Open February 12, 2025

# Ministry of Municipal Affairs and Housing

## Ensuring Accurate and Timely Housing Data to Inform Policy & Funding Decisions

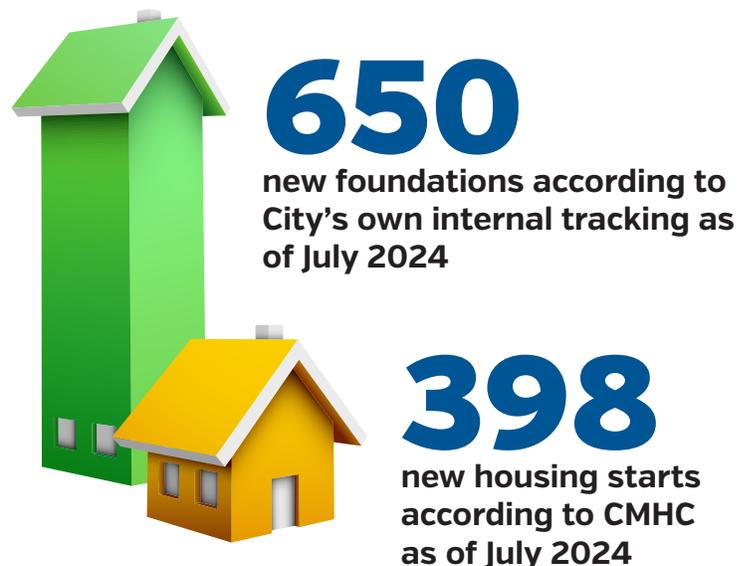
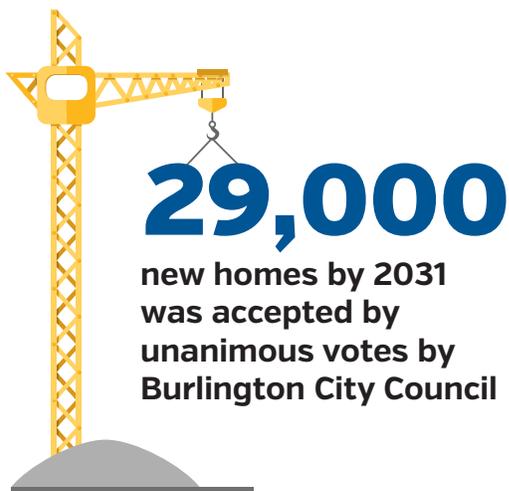
Burlington City Council has unanimously voted to accept our housing target of building 29,000 homes by 2031. However, the current use of CMHC numbers of foundations poured as the qualifier for the Building Faster Fund is problematic because it is inaccurate and not within the control of the municipality.

We cannot compel developers to pour a foundation. Housing development is significantly impacted by interest rates, supply chain issues, labour force demands, inflation and other pressures. In order to truly enable shovel in the ground, we request a comprehensive approach that recognizes all the factors to getting housing built, and refrains from financially punishing municipalities for factors outside our control.

There is a need to restore transparency concerning CMHC's reporting practices to help ensure municipal confidence in the integrity of the organization's data and reporting and to ensure municipalities are not caught off-guard with discrepancies between data sources.

For example, according to the provincial housing starts tracker in July 2024, Burlington has only achieved 398 new housing starts, whereas the City's own internal tracking indicates over 650 new foundations have been made. The discrepancy is startling and creates internal planning challenges when municipal efforts to meet provincial targets are not accurately tracked between orders of government.

We recommend further collaboration with municipalities to understand local data collection methods and to incorporate municipal data, such as first inspection records, into CMHC's housing start counts. Moreover, it is critical to ensure that municipalities receive provincial funds they are entitled to based on accurate housing start counts, enabling them to support local housing initiatives.



# Background

Burlington City Council is focused on enabling housing by improving our permit process so that more homes can be built. We have struck the Pipeline to Permit Standing Committee, comprised of members of Council and industry experts to provide tangible recommendations on how to issue more housing permits. To date, we have a total of 45,066 units in our permit pipeline, 5,427 of which have been approved. We are doing our part in this way and we are focusing on what we can control.

Beyond being out of our control, Building Faster Fund criteria is utilizing data that appears to be inaccurate. The Ministry of Municipal Affairs and Housing is using new home construction starts from the Canada Mortgage and Housing Corporation. However, this data does not line up with the actual number of housing starts on the ground in cities across Ontario. In Burlington, by our metrics, we have 652 dwelling units created in 2024, which is nearly ten-times greater than the 67 dwelling units currently reported by CMHC.

While Burlington has an action plan in place to meet our housing targets by 2031, we will continue to be at a disadvantage to qualify for the Building Faster Fund for the next few years. This is due to the nature of our current growth, which is multi-residential high density.

We have already developed within our urban boundary on greenfield development and naturally, high-rise buildings take much longer to build than single family homes. Thus, it is predictable that we will not meet the targets for several years before thousands of units will come online. Along with other cities in Ontario, we need this essential funding to support our anticipated growth and serve our future residents. However, the nature of the Building Faster Fund will continue to disadvantage cities like ours whose growth will be primarily in the form of high-density intensification versus greenfield suburbs and will create disparities in services across Ontario.

## Recommendations

1

The Ministry of Municipal Affairs and Housing should alter funding eligibility on the basis of housing approvals rather than housing starts, which are a lagging indicator as well as outside of municipal control.

2

Moreover, the disparities in data reporting and collection need to be addressed to ensure that municipalities and stakeholders are equipped to succeed in pursuit of the province's goal of 1.5 million new homes by 2031.



# Ministry of Municipal Affairs and Housing

## Ministerial Zoning Order Framework Request: Millcroft Greens

The Ontario Land Tribunal (OLT) has issued a recent decision and interim order to approve the redevelopment of parts of the Millcroft Golf Course by the Millcroft Greens Corporation on June 12, 2024. In July 2024, Burlington City Council unanimously passed a resolution requesting the Minister of Municipal Affairs and Housing to issue a Ministerial Zoning Order (MZO) to preserve green space from development on lands currently operating as the Millcroft Greens Golf Course, by retaining the Parks and Open Space designation on these lands.

This builds on and repeats an earlier request made by unanimous resolution in September 2023 for an MZO. The city formally submitted an application for this MZO through the Ministry's online Zoning Order Request Framework portal.

Time is of the essence as the Ontario Land Tribunal (OLT) has issued a recent decision and interim order to approve the redevelopment of parts of the Millcroft Golf Course by the Millcroft Greens Corporation.

To be clear, Burlington Council is not requesting interference with the OLT process or ruling. Burlington Council is requesting the Province issue a Ministerial Zoning Order as there is limited time to act to save this area before shovels are in the ground for development.

Additionally, city staff will continue to proceed with finalizing the planning instruments in accordance with the interim OLT order until such time as we receive a decision from the province on the MZO request.

In September of 2023, Burlington City Council unanimously approved a resolution

requesting the Minister of Municipal Affairs and Housing and the Province to step-in and issue a ministerial zoning order to save the greenspace at Millcroft Golf Club.

Burlington City Council requested the Minister of Municipal Affairs and Housing to advise the Ontario Land Tribunal under section 22(11.1) and section 34(27) of the Planning Act that a matter of provincial interest is, or is likely to be, adversely affected by the amendments in respect of which the appeals are made regarding Millcroft Greens' proposed Official Plan and Zoning By-law amendments and related plan of subdivision (OLT-22-004149) and to attend the Ontario Land Tribunal hearing in support of the City's position.

Burlington City Council further requested MMAH to use all resources and tools at its disposal to confirm the Province's interest in the Millcroft Golf Club golf course, including introducing legislation and preparing a development plan under the Ontario Planning and Development Act to protect and preserve the existing uses of Areas A to D; and to issue a Minister's Zoning Order under Section 47 of the Planning Act to facilitate appropriate residential development in Area E and ensure the protection of the greenspace and natural areas from re-development of Areas A, B, C and D on the Millcroft Golf Club golf course.

The Ontario Land Tribunal (OLT) has issued a recent decision and interim order to approve the redevelopment of parts of the Millcroft Golf Course by the Millcroft Greens Corporation on June 12, 2024. After passing a Council Resolution on the subject, Burlington City Council is requesting the Province issue a Ministerial Zoning Order as there is limited time to act to save this area before shovels are in the ground for development.

# Background

Millcroft Greens Corporation applied to the City to the City of Burlington for a plan of subdivision and to amend the City's Official Plan and Zoning Bylaw to develop portions of the Millcroft Golf Club golf course with 90 single detached homes. The same applications also proposed the development of a separate parcel that has been designated in the City's Official Plan as 'Residential - Medium Density', with a 6-storey residential apartment building or townhouse development. The applications were appealed and approved by the Ontario Land Tribunal.

While Burlington City council is committed to accommodating its share of growth and has unanimously signed on to the Municipal Housing Pledge for 29,000 homes by 2031, the proposed development on the golf course is not needed to meet or exceed this housing pledge, ample land is available to accommodate new growth within our urban area around GO stations, aging retail plazas and major transportation corridors that don't compromise existing greenspace. The needs and interests of Burlington residents are captured in the City's Official Plan in effect and as adopted by Council in 2022 to provide clarity and certainty about planned future housing development sites, and does not include any requirements or need to redevelop the Millcroft Golf Course.

The Millcroft Golf Club golf course is part of a stable residential neighbourhood known as the Millcroft Community, and Millcroft Golf Club can continue to operate the golf course on the subject lands and benefit from existing uses. The parks and open space currently operating as the Millcroft Golf Course is unique among golf courses, in that it is in an urban area, designed as a figure eight weaving among houses, functioning as natural storm water conveyance, and we know of no other golf course with these set of conditions.

It is also important to note that a recent Burlington Staff Report found a deficit of urban greenspace of 104 hectares to accommodate planned population growth for 2051. The city cannot afford to risk the loss of additional urban greenspace from both a recreational and environmental perspective.

Additionally, Oakville-North Burlington Member of Provincial Parliament Effie Triantafilopoulos has formally declared her support for maintaining the Millcroft Golf Club golf course as greenspace, and has presented in the legislature several thousand signatures on a petition from residents across the city of Burlington and beyond as well as formally requesting via letter that the Province and the Minister of Municipal Affairs and Housing preserve this greenspace through the issuance of a Ministerial Zoning Order or other means as available.

## Recommendations

1

That the Minister of Municipal Affairs and Housing, through its zoning order framework process, to issue a Ministerial Zoning Order to maintain the zoning permissions for Areas A to D of the proposed development of the Millcroft Golf Course as they existed prior to the June 12, 2024 OLT decision.



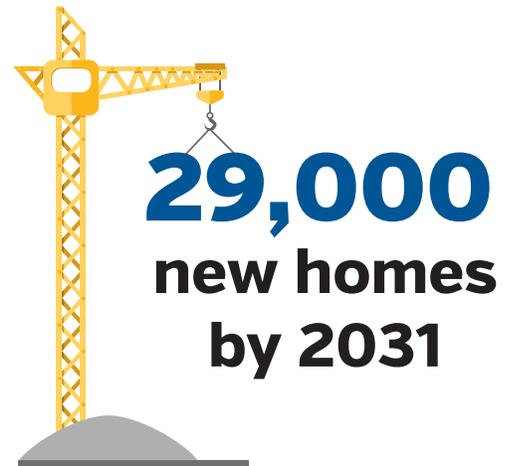
# Ministry of Municipal Affairs and Housing

## Ensuring Burlington’s Development Horizon Through Flood Mitigation

Burlington City Council is committed to accommodating its share of growth and has unanimously signed the Provincial Housing Pledge for 29,000 homes by 2031. However, recent studies and assessments completed by the City of Burlington and Conservation Halton identify flood hazards on portions of the Downtown Burlington Urban Growth Centre/Burlington GO Major Transit Station Area (MTSA) and the Appleby MTSA.

The City of Burlington requires additional clarification and potential exemptions from various components of the PPS 2024 to ensure the successful development of its MTSAs towards achieving the province’s goal of building 1.5 million homes by 2031.

Given that Burlington’s watershed begins in rural catchment areas, a fulsome flood master plan is currently being studied and developed, but will require additional resources and clarification on components of the PPS 2024.



## Background

Downtown Burlington has historically been susceptible to flooding that was collectively addressed by the Province, Conservation Halton and the City with the construction of the Rambo/Hager Highway 407 Diversion and flood control system to protect these lands from flooding.

Provincial policy generally directs development away from hazardous lands as per Section 5.2 of the Provincial Policy Statement, 2024 (PPS); and the Downtown Burlington Urban Growth Centre/ Burlington GO MTSA and the Appleby MTSA are identified as strategic growth areas.

To this end, the City of Burlington plans to submit an application under the provincial Flood Hazard Identification and Mapping Program (FHIMP) to better execute this initiative that will cover both rural and urban areas.

The City of Burlington recommends that the Province of Ontario meet with City staff to discuss competing

provincial objectives and policies related to growth/ development and natural hazards, and to further explore policy solutions to address this challenge as outlined in Section 5.2 of the Provincial Policy Statement, 2024.

Specifically, the City of Burlington requests that the Province update its technical guidelines/criteria that support the PPS, including the “Technical Guide, River & Stream Systems: Flooding Hazard Limit”; and release updated Section 28 Regulations under the Conservation Authorities Act to eliminate red tape and ensuring municipalities can successfully develop their MTSAs according to provincial priorities.

Moreover, the Provincial Planning Statement, 2024 (PPS) directs growth and development away from flood hazards, this broad-based policy direction prohibiting new development also applies to “spill flood hazards” or “spills,” which can often be mitigated. Spills are considered regulated hazards per

the definition of hazardous land in O. Reg. 41/24 and are also included in the more expansive definition of hazardous lands under the PPS.

Spill flood hazards affect portions of important areas of growth and intensification within Burlington, including the Burlington GO and Appleby GO MTSAs, downtown, and surrounding residential neighbourhoods. In many cases, this is impacting the City's ability to permit residential development and achieve our housing pledge targets.

Considering the actual impact of studied spill hazards using modern modelling approaches, the City of Burlington believes that flexibility ought to be offered, particularly in strategic growth areas to support building more homes in balance with the protection of human health and safety.

To this end, the City of Burlington has undertaken Phase 1 and Phase 2 Flood Hazard Risk Assessments of the Lower Rambo Creek Watershed Area that includes the Burlington GO MTA and the Downtown, and has collaborated with Conservation Halton to:

- Expedite a comprehensive review of the Watershed Studies and each of the two Study Areas;
- Jointly identify priority areas and recommended options, mitigation measures, preliminary schedules and budgets to be analyzed in greater detail;
- Identify the mitigation measures required to be implemented; and,
- Explore a schedule for the completion of the required flood mitigation improvements to assist the achievement of the goals and objectives of the Official Plan for the Region of Halton, the City of Burlington Official Plan and the provincial housing target.

To provide clarity and consistency on how spill flood hazards are defined and addressed by municipalities and conservation authorities, the City of Burlington respectfully requests that the Province provide clarity that would assist conservation authorities to interpret

the PPS. Such clarity could also allow for greater flexibility in leveraging the data produced by new modelling approaches, and a detailed understanding of risk that considers the depth, velocity, length and frequency of impacts.

The objective is to consider Spills different than traditional Floodplains by:

- Clarifying whether Spills meet the Hazardous Lands definition in the PPS instead of the Flooding Hazard definition;
- Considering different access/egress requirements for Spills versus Floodplains;
- Considering the actual impact of studied spill hazards using new modelling approaches to build reasonable approaches to managing the risks; and,
- Offering flexibility for strategic growth areas.

Addressing the flood hazards will require additional studies and infrastructure improvements and the Flood Hazard Impacts and Mitigation Assessment will require a continuation of the coordinated effort between various agencies and the provincial government.

Both City Staff and Conservation Halton have confirmed that there are conflicting provincial policies, particularly within existing highly urbanized areas, that need to be resolved. If desired, City of Burlington and Conservation Halton staff would be pleased to participate in a working group with staff from Ministry of Municipal Affairs and Housing to work together on defining potential solutions.



**SUBJECT:** Housing and Community Improvement Plan Update

**TO:** Pipeline to Permit Committee

**FROM:** Development and Growth Management  
Community Planning

Report Number: DGM-28-25

Wards Affected: all

Date to Committee: March 6, 2025

Date to Council: March 18, 2025

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## **Purpose**

The purpose of this memo is to provide the Pipeline to Permit (P2P) Committee with an overview of actions which together enabled the City to move forward with the proposed Rental and Affordable Housing Community Improvement Plan (CIP). Committee of the Whole will consider and decide on the CIP in spring 2025.

The discussion with P2P will be supported by this memo and a companion presentation. This is an opportunity to leverage your insights and experiences to support the implementation of a housing-oriented CIP aligned with the City's objectives.

Staff will share details on the City of Burlington's actions which together enabled the City to move forward with the housing-oriented CIP:

- [Housing Strategy \(2022\)](#)
- Housing Accelerator Action Plan (2024)
- Proposed Rental and Affordable Housing Community Improvement Plan (2025)

## **Background Housing Strategy**

The Housing Strategy, approved in June 2022, challenges the City of Burlington to take on an ambitious role in order to move the City closer to our vision for housing which states:

*“Everyone is welcome in Burlington. Burlington is a city where all current and future residents have access to the housing options that meet their needs at all stages of life, and that are attainable at all income levels.”*

The Housing Strategy provides a roadmap for addressing local housing needs and increasing housing options that meet the needs of current and future residents at all stages of life and at all income levels. It identifies the key players in housing and their respective roles, including the role of the City of Burlington. The Housing Strategy identifies 12 Actions to move toward the vision for housing in Burlington.

Based on the findings of the [technical research](#) completed in earlier project phases, and subsequent discussions with Burlington City Council; the project steering committee; and the project working group, it was determined that the City of Burlington, as a lower tier municipality, has two key opportunities to do its part to “make moves” in addressing the broader housing crisis:

- First, through partnership and advocacy with upper levels of government and housing providers to help deliver the deep affordability and housing options needed by residents of Burlington within the lower income deciles; and
- Second, through focusing on implementing the direct actions that the City can take to increase housing options and opportunities for residents of Burlington within the middle-income deciles.

The Housing Strategy also emphasizes the City’s role and opportunity to address “missing middle” both from the perspective of having housing options that are affordable/attainable for middle-income households and for the opportunity to diversify the spectrum of housing types and tenures.

### **Housing Accelerator Action Plan (2024)**

Staff Report [CS-13-23](#), presented a Housing Accelerator Fund (HAF) [Action Plan](#) for endorsement in principle and authorized staff to submit the City’s application on August 18, 2023.

On January 15, 2024, Infrastructure Canada and CMHC announced the City’s application was approved for \$21,156,248.60. These funds will be advanced to the City over the course of four years based on a successful annual review by CMHC. The first funding advance was received in January 2024. The second advance is anticipated for February 2025. To receive full funding the City must meet all the following targets and initiatives:

1. Housing Targets

- a. Total Supply Growth target of 2,724 permitted housing units
- b. Additional targets:
  - 1,047 missing middle housing units (defined as 4-stories or less and not a single residential unit)
  - 1,294 other multi-unit housing units
  - 8.4% (228) of the Housing Supply Growth Target are affordable units.

The City is responsible for achieving all housing targets by December 31, 2026.

2. Initiatives:

The following seven initiatives were included in the HAF application as the City's Action Plan:

1. Streamlining planning and building approval process.
2. Implementing Major Transit Station Areas and Community Planning Permit System.
3. Support and encourage the creation of additional residential units and consider opportunities to increase as of right permissions.
4. Identify opportunities to incentivize the creation of rental and non-market housing.
5. Build community and partner capacity by creating a Housing Connections Centre.
6. Public lands and partnerships.
7. Municipal infrastructure needs.

On November 4, 2024, Council received a HAF update ([PL-82-24](#)), and approved the proposed [HAF implementation budget](#). Currently, the City does not fund a Community Improvement Plan. The City currently has the opportunity to leverage available HAF funds to support implementation of the proposed Rental and Affordable Housing CIP in order to achieve the HAF missing middle and affordable rental housing targets.

Council information report [DGM-19-25](#) provided a progress update on achievement towards the housing targets, initiatives, and the proposed next steps to further implement the approved HAF Action Plan. This report noted that as of January 2025, 50% of the total Housing Supply Growth target (2,724 units) has been achieved.

## **Initiatives to Increase Housing Options and Supply**

Community Planning has led several recent initiatives that align with the City's Housing Strategy Vision to increase housing options to meet the needs of all residents at all stages of life and at all income levels and fulfill obligations in the City's Housing Accelerator Fund Action Plan.

The [Official Plan and Zoning By-law Amendments to Increase Housing Options](#) was approved by Council on January 28, 2025. These amendments to the [Official Plan, 2020](#) and [Zoning By-law 2020](#), permit four units as-of-right through the Additional Residential Unit policies contained within the Burlington Official Plan, 2020 and Zoning By-law, 2020. Additionally, OPA 3, amends the policies of the Residential Neighbourhood Area, BOP, 2020.

OPA 3 establishes built form as a metric used to describe the degree of development within the residential neighbourhood areas rather than density, supported by other policy guidance to be implemented through the Zoning By-law. This amendment works to increase the diversity of housing options, within the City's Urban Area to support gentle ground-oriented intensification that considers the context and character of Burlington's Established Neighbourhoods while providing opportunities for more diverse housing options to meet the needs of all residents at all stages of life and at all income levels.

This new policy framework sets the stage for the city to achieve its P2P and HAF housing unit targets. These actions also support a number of the key recommendations provided by the University of Waterloo Student team including promoting diverse housing options and infill development.

## **Proposed Rental and Affordable Housing Community Improvement Plan**

The Council-approved Housing Strategy and HAF Action Plan identify the need for the City to develop a Community Improvement Plan (CIP). A CIP is a tool that allows a municipality to direct funds and implement policy initiatives toward a specific strategic and planning objective. [Staff Report PL-56-24: Community Improvement Plan Study Draft Terms of Reference](#) presents a [terms of reference](#) that was endorsed by Council on July 16, 2024.

Supported by HAF funds, staff are working with a consultant to deliver the proposed CIP to Committee of the Whole in spring 2025. CIP financial incentives were identified throughout the 2023 and 2024 reports to Council as essential to achieve the HAF total Housing Supply Growth and especially the 8.4% (228) affordable housing unit targets before the end of December 2026. Developing and implementing a CIP also supports the University of Waterloo Student presentation research findings that identified incentivizing housing development as having a key role in achieving housing objectives.

The proposed CIP, once approved, is anticipated to be in place for ten years. The [HAF implementation budget](#) provides for funding over 2025 – 2026 or based on availability of HAF from CMHC.

## **What We've Heard**

The draft CIP approach has considered input to date from the community, Deputy Mayor for Housing and City Councillors, staff from across city departments, building and development industry stakeholders including the Burlington Housing Development Liaison Committee (HDLC) and representatives that sell, manufacture and build ARUs, and the Region of Halton in its capacity as provider of assisted and special needs housing.

Key feedback includes:

- Support for a suite of incentive options to address various permanent affordable rental housing needs, including three-bedroom units
- Grants should be tied to the provision of affordable rental units, with an agreement for an affordability period
- Leverage existing CMHC and City programs and allow for financial incentive stacking
- Strong support from building industry for Tax Increment Equivalent Grants (TIEGs)
- CIP should apply to the urban area, where there is existing services and infrastructure
- Need to drive interest in the CIP incentives and support property owners and housing providers in the incentive application process

## **CIP Financial Incentive Options**

The draft CIP will include a variety of proposed financial incentive programs to promote an increase in permanent rental housing stock in both ground and non-ground-oriented housing forms, including additional residential units (ARUs) and multi-unit housing, with an emphasis on affordability. The draft CIP will be applicable to the City's Urban Area. The CIP financial incentives are available to both private and public sector housing providers.

The proposed CIP programs may include grants for pre-development studies and fees and for housing projects that further city housing objectives, and forgivable loans for new affordable-rental units such as ARUs, units in multiplexes, townhouses, and multi-unit buildings.

Tax Income Equivalent Grants (TIEGs) that grant back a portion of the property tax uplift from a new housing development with affordable-rental units are also being proposed, subject to further implementation assessment.

Financial analysis was undertaken to develop the forgivable loan and grant values, considering residual land value, market conditions and average market rents. Staff will present an overview of the proposed CIP including a high-level overview of financial incentives and other important elements of the CIP.

### **Next Steps**

The proposed CIP will be released on the [Get Involved Burlington Housing Strategy](#) webpage, providing opportunities for public input up to and including at the Statutory Public Meeting. All public input will be provided to Council as they consider the CIP programs.

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### **Memo Approval:**

All memos are reviewed and approved by the Commissioner, Head of Corporate Affairs, Chief Financial Officer, and Commissioner of Legal and Legislative Services/City Solicitor.

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**SUBJECT:** Response to Recommendations from University of Waterloo Students – Zoning By-laws and Housing as a Human Right: A Study of the City of Burlington

**TO:** Pipeline to Permit Committee

**FROM:** Development and Growth Management  
Community Planning

Report Number: DGM-31-25

Wards Affected: All

Date to Committee: March 6, 2025

Date to Council: March 18, 2025

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### **Memo Details**

The purpose of this memo is to provide a response and extend our appreciation to the students from the University of Waterloo for their presentation at the January 16, 2025 Pipeline to Permit Committee meeting. The presentation was comprehensive and highlighted the research the students conducted into exploring the relationship between zoning and housing as a human right, including an examination of the City of Burlington's policy landscape, best practices review, and a set of recommendations for consideration by the City as part of the New Zoning Bylaw Project. The presentation highlighted a few practices that are emerging within municipalities globally and across North America that provide valuable perspectives.

The students identified several key recommendations in their presentation, which include:

- Condensing Zones and using Form-Based Code / Progressive Typology-Based Approaches
  - Flexibility in the Development of Housing – Ottawa and Edmonton focus on physical form instead of use
- Promoting Diverse Housing Options
  - Inclusive Development of Housing – allow shared living shared living models in more neighbourhoods
- Reducing Zoning Requirements for Building Envelopes
  - Flexibility in the Development of Housing – reducing zoning requirements to create more flexible, diverse and affordable housing options
- Ensuring Compatibility Between the Zoning By-law and Other Legislation

- Address Inconsistencies that Constrain Housing Development – alignment of Burlington’s Official Plan and Zoning Bylaw to improve housing access
- Incentivizing Development
  - Standardize Community Benefit Charges and Inclusionary Zoning – key tools to incentivize development, ensuring consistent, transparent and equitable contributions to community benefits
- Promoting Infill Development
  - Intensification-focused Residential Zoning Framework – adding framework to the Zoning Bylaw and supporting policies in Burlington’s Official Plan

City staff have had the opportunity to review these recommendations and will consider them in more detail as part of the ongoing work through the New Zoning Bylaw Project (NZBP). Several of the recommendations are aligned with the goals and objectives of the project and are being considered as part of the work that is already underway. The alignments are summarized below:

- Condensing Zones and using Form-Based Code / Progressive Typology-Based Approaches.
  - The new zoning bylaw will incorporate both modern and best planning practices and will look for opportunities to consolidate residential zones. Doing so would reduce the amount of regulations and ensure greater flexibility for dwellings within existing neighbourhoods. Consideration will also be given to the use of form-based zoning to implement the objectives and policies of the Burlington Official Plan (BOP, 2020).
- Promoting Diverse Housing Options
  - The project will implement the objectives and policies of the new BOP, 2020, particularly Section 8.3 Residential Neighbourhood Areas, and also the new policy framework set out in Official Plan Amendment #3 (OPA 3). For example, OPA 3 emphasizes the importance of “built form” as a key test for compatibility rather than density. This approach will be carried through and implemented through the Zoning By-law. OPA 3, and the guidance it provides to the New Zoning Bylaw Project, works to increase the diversity of housing options, within the City’s Urban Area to support gentle ground-oriented intensification that considers the context and character of Burlington’s Established Neighbourhoods while providing opportunities for more diverse housing options to meet the needs of all residents at all stages of life and at all income levels.
- Reducing Zoning Requirements for Building Envelopes
  - As part of the New Zoning Bylaw Project scope, the City is looking for opportunities to provide more flexibility and adaptability as development trends change. This is accomplished in part by reducing the number of zoning provisions that depend on others, and being intentional about the regulations that are being advanced. This overall direction is in alignment with the consideration

to reduce zoning requirements for building envelopes to support diverse housing options.

- Ensuring Compatibility Between the Zoning By-law and Other Legislation
  - In response to the housing crisis there has been a shift in legislation, policy and approach at all levels of government. At City level, these changes have included the City Housing Strategy and the City's commitments associated with the Housing Accelerator Fund. The New Zoning Bylaw Project will implement the policy framework of the new BOP, 2020, including OPA 3, and will be informed by other on-going initiatives at all levels of government. Alignment between policies of BOP, 2020 and the regulatory framework of the new zoning bylaw is a primary consideration for the project and to support the focus on supporting more housing options in Burlington neighbourhoods.
- Incentivizing Development
  - The New Zoning Bylaw Project will continue to look for opportunities to encourage investment and redevelopment, and remove barriers, in an effort to facilitate new housing. This can be achieved by some of the items noted above, including looking for opportunities to be user friendly, easy to interpret and facilitate a streamlined process for residents and the development community. The project is also giving consideration to pre-zoning areas for residential development, providing a broader range of permissions and more flexible provisions. The suggestion for standardizing community benefit charges and inclusionary zoning will be considered in more detail as part of the ongoing work through the New Zoning Bylaw Project, and in conjunction with parallel City initiatives such as the Community Improvement Plan that will be forthcoming in spring 2025.
- Promoting Infill Development
  - As noted above, the New Zoning Bylaw Project is tasked with implementing the objectives and policies of Section 8.3 Residential Neighbourhood Areas, and also the new policy framework set out in OPA 3. This amendment works to support gentle ground-oriented intensification within Burlington's Established Neighbourhoods while providing opportunities for more diverse housing options to meet the needs of all residents at all stages of life and at all income levels. Consideration will be given to exploring the use of intensification-focused residential zoning framework as part of the ongoing work related to the New Zoning Bylaw Project.

We encourage participation in the project going forward. Additional details about the project are provided in the link below. As part of the project engagement process, we will look for an opportunity for City staff to come to a future P2P meeting to provide an update on the project.

<https://www.getinvolvedburlington.ca/newzoningbylaw>

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**Memo Approval:**

All memos are reviewed and approved by the Commissioner, Head of Corporate Affairs, Chief Financial Officer, and Commissioner of Legal and Legislative Services/City Solicitor.