RESIDENTIAL AND
CIVIL
CONSTRUCTION
ALLIANCE OF
ONTARIO

RCCAO

Constructing Ontario's Future

January 25, 2019

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor
777 Bay St.
Toronto, ON M5G 2E5

Dear Minister Clark,

RE: Consultation: Increasing Housing Supply in Ontario

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide comments on the government's consultation document that will serve to inform the Housing Supply Action Plan.

RCCAO is an alliance of key labour and management stakeholders derived from the residential and civil construction sectors. The RCCAO was created to address the major challenges affecting the construction industry. We work together with government and industry experts to offer realistic solutions to problems in the areas of infrastructure development, growth planning, regulatory reform and labour shortage.

Our recommendations focus on several important concepts for the industry, supporting complete communities in the province by addressing the missing middle element of housing, integrating Municipal Class Environmental Assessments into municipal official plan reviews, and treating excess soils generated from projects in Ontario as a resource.

We appreciate the opportunity to provide you with our recommendations and look forward to continue working with you on this and other important industry files.

Regards,

Andy Manahan
Executive Director

RESIDENTIAL AND CIVIL CONSTRUCTION ALLIANCE OF ONTARIO

RCCAO

Constructing Ontario's Future

RCCAO Recommendations

1. **The Growth Plan should support complete communities.**

The Growth Plan talks a lot about complete communities, but it still needs to put more emphasis on implementation. That includes linking transit infrastructure and urban form through much faster zoning updates aligned with transit developments, in order to support complete communities.

The Growth Plan's density targets are not enough to achieve complete communities that provide and support a mix of housing options. Complete communities include transit and pedestrian oriented high-rise, mid-rise and other "missing middle" types of ownership and rental housing near transit stations and arterials with amenities such as stores, libraries, cafes etc.

A recent report by CANCEA, "The GTHA's Unbalanced Housing Stock: Benchmarking Ontario's New LPAT System", found that only 15 percent of GTHA households live in medium-density housing, or "the Missing Middle". Housing types can be broadly grouped into three categories, low-density, medium-density and higher-density housing. Medium-density homes are the most varied, comprising townhomes, multiplexes and low-rise buildings, courtyard apartments and other multi-unit housing types that provide a more affordable, ground-oriented option than detached housing.

Medium density is a context-dependent concept. In larger cities where 30-40 storey buildings are common, 10-storey buildings represent a much lower average residential density in comparison and could be considered the low end of a higher density concentration. In contrast, smaller cities and towns where the tallest building are less than 15 storeys, the definition will necessarily be different.

Currently, about 55% of GTHA households live in low-density dwellings, and 30% live in higher-density buildings. The dominance of single-detached homes and high-rises over all other possible types of housing in the GTHA, resulting in a relatively low-density urban region with pockets of ultra high-density clusters. The consequence is an insufficient supply of appropriate housing types for a range of household sizes and budgets. No region has more than 25% of its housing stock in medium density dwellings, and all but Toronto have more than 60% of their stock in low density housing.

Further, the high proportion of single-detached ownership housing, combined with a lack of new purpose-built rental supply, results in a market that is out of balance. Consequently, there is an insufficient supply of appropriate housing types for a range of household sizes and budgets. There is currently a shortage of missing middle housing forms – such as mid-rise buildings as well as stacked and regular townhouses – in existing communities. A review of the Growth Plan, with revised density and intensification targets for designated greenfield areas, is thus appropriate.

Complete communities also include a balanced portion of ground oriented detached and family-oriented housing. This diversity of housing forms serviced by transit and other key facilities, allows people to remain in the same community as their housing needs change over time and through

changing circumstances. Something similar to the old "streetcar suburbs", needs to be replicated in some of the designated greenfield and urban fringe areas in order to provide complete communities.

2. MCEAs should be integrated into municipal official plan reviews.

Approval of municipal infrastructure projects such as roads, bridges, bike paths and other public works must go through a Planning Act process but often are subject to review under the Municipal Class Environmental Assessments (MCEA) process.

An opportunity exists to streamline approvals by consolidating public consultation requirements. Having two separate consultation processes, including appeal rights under the MCEA process (known as a Part II Order request or PIIOR) is duplicative and unnecessarily adds costs to many local projects.

There are also instances when the Municipal Class EA process exceeds the capital construction cost for infrastructure projects. For example, a box culvert style bridge in Ennis took two-and-a half years, with capital costs of $489,000 with study costs coming in at $494,000. Another box culvert style bridge project going from existing one-lane to a two-lane road in Erin came in under budget at less than $600,000, but the municipal assessment study cost $1.1 million.

The Ministry of the Environment, Conservation and Parks (MECP) accepted an EBR application in 2017 by the Residential and Civil Construction Alliance of Ontario and the Municipal Engineers Association to undertake a comprehensive review to improve the MCEA process. This review was to have been completed by the end of 2018.

Currently in the United Kingdom, environmental assessments for local projects are integrated into the official plan development process. MECP should still be responsible for environmental assessments for higher risk or larger municipal infrastructure projects such as sewage treatment plants and power stations.

PIIORs, which are request that deal with outstanding environmental issues that have not been addressed through the class environmental assessment process, create substantial additional delays and costs on municipal proponents. Time and costs associated with PIIORs can be reduced by delegating authority to the MECP director level and adhering to reasonable deadlines following which PIIOR are presumed denied.

3. Excess soils generated from projects in Ontario should be treated as a resource, not a waste.

For 2015, it is estimated that a minimum of 25.8 million m^3 of excess construction fill was generated in Ontario. To put this volume into perspective, this amount of soil would fill the Rogers Centre to the top of the roof 16 times.

A mindset seems to exist among people managing soil that it is easier (and less risky) to dispose of soil as a waste rather than to implement ways mechanisms to reuse or recycle it. This is reflected in research that shows that in 24 case studies of construction projects, more than 50 percent of the soil is disposed of in landfill. One way to ensure more soil is treated as a resource, is to put more onus on the source site or property owners (including municipalities) through more front-end soil reuse planning.

In the recently released Made-in-Ontario Environment Plan, there is movement in the right direction regarding management of excess soils, including a recommendation for increasing the redevelopment and clean-up of contaminated lands in Ontario and making it easier and safer to

reuse excess soil. Properly managing excess soils would result in significant cost savings, given that on average, handling and disposal of excess soil represents 14 percent of the total project value. For the 24 case study projects, this represents total costs of $46 million. RCCAO and the Greater Toronto Sewer and Watermain Contractors Association released a three-part video series in 2018 on the advantages of implementing best practices for managing construction soil.