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OHBA response to ERO 019-1406 - proposed regulation under *More Homes, More Choice Act, 2019 (Bill 108)*

Proposed regulatory matters pertaining to community benefits authority under the *Planning Act*, the *Development Charges Act*, and the *Building Code Act*.

The Ontario Home Builders' Association (OHBA) and our network of 29 local associations are strongly supportive of the *More Homes, More Choice Act, 2019 (Bill 108)* and the *Housing Supply Action Plan*. We believe that the visionary plan will remove barriers to providing more housing for the current and future residents of Ontario.

OHBA is a community of #HomeBelievers. As #HomeBelievers, we believe in the great Canadian dream of home ownership. We believe that people should be able to find homes they can afford in communities where we can live, work and play. We believe that the dream of home ownership is slipping out of reach for many Ontarians. OHBA will continue to support more housing choice and supply across Ontario to help all of us achieve the great Canadian dream of home ownership. OHBA recognizes that this is a #HomeBeliever government, committed to supporting more homes and more choice across Ontario.

OHBA previously responded on August 6, 2019 with general support of the three regulatory postings with further recommendations for improvement to implement various aspects of this comprehensive piece of legislation (ERO 019-0183, 019-0181 and 019-0184). OHBA participated in technical working groups and provided further recommendations in a letter to the Ministry in October 2019 regarding the structure and framework of the proposed Community Benefits Charges Framework. Furthermore, OHBA was supportive of Bill 138, *Plan to Build Ontario Together Act (Budget Measures Act)*, where new provisions were passed so that a CBC By-Law will be appealable to the LPAT.

OHBA is now providing our comments and specific recommendations to the February 28th Environmental Registry posting on the proposed regulatory matters pertaining to community benefits authority under the *Planning Act*, the *Development Charges Act*, and the *Building Code Act*. OHBA notes that our recommendations in this submission pertain specifically to the residential sector and not to the ICI sector (industrial, commercial and institutional).

The COVID-19 pandemic has drastically altered Ontario's and the entire world's landscape over the past few weeks. The provincial government must take into consideration the economic fallout from the health crisis as it determines an appropriate path forward for the implementation of a new community benefit authority and amendments to development charges. On April 9th, the Premier announced a new *Ontario Jobs and Recovery Committee* which will focus on getting business up and running and people back to work after the COVID-19 pandemic is over. OHBA notes that it was the housing sector that led both Ontario and Canada out of the 2008/09 financial crisis, and our sector is well positioned to do the same in the months ahead. It is therefore critical that the provincial government not create a new CBC framework that can be used by municipalities to cripple the industry and burden consumers by adding tens of thousands of dollars of new costs to a home. Considering the current COVID-19 State of Emergency, this is the time for the provincial government to take on a more direct approach and focus on reducing government-imposed charges on new housing to incent even more construction. We are all in this together and housing can lead Ontario's economic recovery.

To summarize, while we have very specific and detailed recommendations – OHBA's top five specific issues that the government must address to ensure a fair, balanced, accountable and transparent approach for the new Community Benefits Charges authority in support of housing supply and job creation are as follows:

-) The CBC framework should NOT apply to low-rise and missing middle housing below a density threshold of 100 units per net hectare, with development at lower densities subject to parkland dedication at the 5% rate;
-) Having restored a number of services to Development Charges, the CBC should be limited to high-rise / high-density, defined as projects that have a density threshold equal and greater than 100 units per net hectare and be utilized for community benefits (including parkland) up to a maximum of 10% of land value;
-) The appraisal / land valuation date for a CBC be moved earlier in the planning process;
-) The regulation must include a robust and fair ineligible services list;
-) Service standards must be applied for municipal implementation of CBC by-laws.

OHBA has been supportive of this government's bold and transformational changes to address a generational housing and supply challenge that is making both home ownership and rental housing unaffordable. However, we are very concerned that the regulatory posting as proposed, can and will result in *significant* increases when municipalities apply the CBC framework to government-imposed charges for low-rise (ground related) housing. It cannot be understated how significantly charges could increase based primarily on two factors – the maximum percentage cap of 15% and a valuation date for low-rise housing at the building permit stage (which would include millions and millions of dollars invested in upgrading a site from raw land to include significant amounts of infrastructure). An analysis by the Altus Group regarding several 905 municipalities indicate that the CBC framework as proposed will result in taxation increases of \$60k to \$87k per detached home. Furthermore, that analysis also suggests that if municipalities apply the proposed CBC framework, they could apply increases of \$15k to \$35k per detached home in 519, 705 and 613 jurisdictions. This is contrary to and will *not* achieve the provincial objectives to increase housing supply, nor will it improve affordability for families to live in Ontario.

• Combined Impacts of Changes to DCs and Introduction of CBCs

Estimated Per Unit Impacts of Proposed CBC Regulations, Residential											
Municipality	Low-Density			High-Density			Current DC & Parkland Contributions per Capita		Proposed DC & CBC Contributions per Capita		
	Dollars per Single-Detached Unit			Dollars per Apartment Unit			Single-Detached Units	Apartment Units	Single-Detached Units	Apartment Units	
	Current DC & Parkland Value	Proposed DC & CBC	Change	Current DC & Parkland Value	Proposed DC & CBC	Change					
Richmond Hill	\$ 124,394	\$ 211,477	\$ 87,083	\$ 75,736	\$ 57,518	\$ (18,218)	\$ 34,487	\$ 29,900	\$ 58,630	\$ 22,707	
Markham	\$ 138,314	\$ 226,017	\$ 87,703	\$ 84,665	\$ 65,564	\$ (19,101)	\$ 36,019	\$ 42,545	\$ 58,859	\$ 32,947	
Vaughan	\$ 149,633	\$ 219,403	\$ 69,770	\$ 77,365	\$ 76,120	\$ (1,245)	\$ 40,332	\$ 41,371	\$ 59,138	\$ 40,706	
Aurora	\$ 111,667	\$ 163,370	\$ 51,703	\$ 71,484	\$ 58,051	\$ (13,433)	\$ 31,279	\$ 33,156	\$ 45,762	\$ 26,925	
Oakville	\$ 114,170	\$ 183,011	\$ 68,841	\$ 51,815	\$ 39,666	\$ (12,149)	\$ 31,626	\$ 26,709	\$ 50,696	\$ 20,447	
Milton	\$ 84,782	\$ 126,192	\$ 41,410	\$ 34,105	\$ 28,102	\$ (6,002)	\$ 24,086	\$ 18,045	\$ 35,850	\$ 14,869	
Mississauga	\$ 127,006	\$ 195,911	\$ 68,905	\$ 68,228	\$ 64,702	\$ (3,526)	\$ 31,594	\$ 28,193	\$ 48,734	\$ 26,736	
Brampton	\$ 114,060	\$ 161,319	\$ 47,259	\$ 59,140	\$ 59,650	\$ 510	\$ 26,342	\$ 24,954	\$ 37,256	\$ 25,169	
Caledon	\$ 106,208	\$ 153,142	\$ 46,934	\$ 55,636	\$ 51,596	\$ (4,041)	\$ 28,971	\$ 26,120	\$ 41,774	\$ 24,223	
Pickering	\$ 67,257	\$ 103,579	\$ 36,322	\$ 39,819	\$ 32,858	\$ (6,962)	\$ 19,053	\$ 17,856	\$ 29,342	\$ 14,734	
Clarington	\$ 65,287	\$ 94,417	\$ 29,130	\$ 31,980	\$ 29,131	\$ (2,848)	\$ 20,792	\$ 19,149	\$ 30,069	\$ 17,444	
Bradford West Gwillimbury	\$ 70,611	\$ 101,000	\$ 30,389	\$ 37,632	\$ 31,293	\$ (6,339)	\$ 20,443	\$ 21,000	\$ 29,241	\$ 17,463	
Ottawa	\$ 43,948	\$ 59,414	\$ 15,466	\$ 32,126	\$ 39,930	\$ 7,804	\$ 12,665	\$ 20,462	\$ 17,122	\$ 25,433	
Barrie	\$ 83,660	\$ 114,570	\$ 30,910	\$ 45,803	\$ 39,780	\$ (6,022)	\$ 25,757	\$ 25,180	\$ 35,274	\$ 21,689	
Guelph	\$ 50,398	\$ 80,632	\$ 30,234	\$ 21,859	\$ 21,061	\$ (798)	\$ 15,125	\$ 11,822	\$ 24,199	\$ 11,390	
							Average	\$ 26,571	\$ 25,764	\$ 40,130	\$ 22,871

As stated in previous submissions, our industry continues to face a variety of inter-related challenges that affect our members ability to build the necessary supply of new housing to meet growing demand for the people of Ontario. These challenges have been compounded by COVID-19 and the economic fallout of the global pandemic. The *More Homes, More Choice Act, 2019* (Bill 108) was a bold, visionary piece of legislation that addressed a number of barriers impacting the cost of delivering new housing supply and the speed of the approvals process that often gets in the way of creating new housing supply.

However, the current regulatory proposal if implemented by municipalities to the proposed maximum cap, threatens to undermine much of the positive momentum and positive public policy initiatives this government has boldly undertaken. If critical adjustments are not made to the proposed framework, low-rise housing costs in the 905, 705, 519 and 613 will increase rapidly and very significantly. Furthermore, the valuation for the CBC so late in the process for high-rise / high-density development is problematic for establishing business and cost certainty and poses significant risk and financial burden on consumers by adding significant additional costs to be charged or added as an adjustment on closing. Those who purchased these high-rise units do not (and often cannot) budget for the increase which they will be forced to accommodate on closing. While OHBA is alarmed by these possibilities, we believe if the following recommendations are implemented that the government can achieve both of its objectives to protect municipal revenue streams while increasing housing supply.

1. Required content of a community benefits charge strategy

-) OHBA is concerned that neither Bill 108, nor the regulation as proposed provides for a clear methodology or imposes any explicit rules for a process for the calculation of a CBC similar to those that apply to the calculation of development charges. There is no clear evaluation of the need for services under the CBC framework vs more robust DC framework within a background study under the *Development Charges Act* - which is tied to the municipal capital projects related to growth.
-) Without a degree of predictability and standardization to the CBC calculation for services required as a result of new development; uncertainty will result for both municipalities and developers regarding the necessary financial contributions for these services. OHBA is concerned that in the absence of a strong

provincial framework with restrictions in place, that many municipalities will implement a CBC with thousands of dollars in additional costs imposed on new housing.

- J OHBA recommends that service standards must be applied for municipal implementation of CBC by-laws. This should include a methodology for the application of those service standards.
- J OHBA is supportive of the requirements for annual reporting by municipalities on the collection and allocation to CBC funds to ensure accountability and transparency.
- J The CBC strategy should include a *Parks Plan* that establishes future parks needs based on future growth / population / demographics (aging populations) in a municipal Official Plan. However, the establishment of future parkland requirements should include service levels and for the purposes of the CBC, those should be NO greater than the current level of service. Rules pertaining to the calculation of the CBC should not allow the CBC to fund increases in parkland service levels to the benefit of existing residents to be funded by the CBC (new residents). Municipalities can always increase their parkland service levels by funding this from the local tax base. In this way, if the public supports the increase, the public will fund the increase.
- J OHBA supports the amendments to the *Planning Act* made under Bill 138 for a CBC by-law to be appealable to the LPAT. It is currently unclear what the scope of an appeal would be as there are no rules for the calculation of a CBC.
- J Without an explicit methodology / framework prescribed by regulation, OHBA is concerned that most municipalities will charge the maximum percentage of land value cap, turning this charge into a new municipal tax.

2. Services eligible to be funded through development charges

- J OHBA notes the newly proposed draft regulation will allow for a number of services to be funded through development charges. The draft regulation would also result in the removal of the 10% mandatory deduction on these services for which they were previously subject to. OHBA is supportive of this shift back to development charges, however we are very concerned by the elimination of the 10% municipal contribution that recognizes a benefit to existing ratepayers. This proposed amendment will increase the amount that new home purchasers will pay in development charges and contributes to the potential for some municipalities to 'gold-plate' services as there will no longer be a contribution from the existing tax base **OHBA can support this amendment only if the 10% municipal contribution is restored**. The services proposed to be moved include:
 - o Parks Development
 - o Recreation
 - o Public Libraries
 - o Public Health
 - o Long-Term Care (OHBA recommends this service not be eligible for DCs nor CBCs)

OHBA recommends that the regulation must prescribe facilities, services or matters for which a CBC cannot be imposed (an ineligible services list):

- J OHBA recommends that the Minister prescribe such types of development or redevelopment in respect of which a CBC cannot be imposed as was initially proposed in ERO 019-0183 posted to the Environmental Registry on June 21, 2019. At the time, the Ministry proposed that the following types of services be exempt from charges for community benefits under the *Planning Act*:
 - o Long-term care homes
 - o Retirement homes
 - o Universities and colleges

- Memorial homes, clubhouses or athletic grounds of the Royal Canadian Legion
- Hospices
- Non-profit housing

) OHBA further recommends the Minister, as was proposed in ERO 019-0183, prescribe that the following facilities, services or matters also be excluded from CBCs:

- Cultural or entertainment facilities
- Tourism facilities
- Hospitals
- Landfill sites and services
- Facilities for the thermal treatment of waste
- Headquarters for the administration of municipalities and local boards

) This list of CBC exclusions would be consistent with the ineligible services list currently found under the *Development Charges Act*.

) OHBA further recommends the Minister prescribe additional services that should not be eligible to be included in either a Development Charge or in a CBC (excluded from BOTH), specifically:

- Municipal airports: New home purchasers and/or renters should not have the costs of an airport embedded as a charge into the cost of new housing;
- Municipal parking: New home purchasers and/or renters should not have the costs of municipal parking embedded as a charge into the cost of new housing;
- Animal Control: New home purchasers and/or renters should not have the costs of animal control embedded as a charge into the cost of new housing;
- Shelters: New home purchasers and/or renters should not have the costs of shelters embedded as a charge into the cost of new housing;
- Courts / Provincial Offences Act: New home purchasers and/or renters should not have the costs of courts embedded as a charge into the cost of new housing;
- Civic Improvements: New home purchasers and/or renters should not have the costs of Civic Improvements embedded as a charge into the cost of new housing;
- Long-Term Care: OHBA notes that this is one of the services being proposed to move from CBCs back to the Development Charges regime. Under the rules that apply to the calculation of a DC they can only be imposed to fund increased capital costs of increased services that arise from the needs of development occurring during the DC background study period. OHBA does not believe a nexus exists between long-term care and new housing development. Therefore long-term care should neither be eligible for development charges nor CBCs.

) OHBA supports the concept that “growth should pay for growth”, however there must be a nexus between the need for the service constructed and the development requiring such a service. No such nexus exists for these services listed in the OHBA recommendation above and new residential development. Furthermore, OHBA has a longstanding position that neither affordable Housing, nor long-term care should be eligible to be funded by development charges, as the requirements for these services are not attributed to new housing development. Therefore, these services should not be eligible for funding from either Development Charges or from the CBC.

) Lastly, should the provincial government restore any additional services from the CBC framework that were previously “soft services” under the *Development Charges Act*, these services must include a 10% reduction as was previously applied under the *Development Charges Act*.

3. Percentage of land value for determining a maximum CBC

OHBA recommends that the CBC framework should NOT apply to low-rise / low-density and missing middle housing defined as projects with a density threshold that is below 100 units per net hectare.

-) The stated intention of the CBC consultation was to maintain municipal revenues while enhancing certainty, cost predictability and transparency. While the regulatory posting through the land value percentage may potentially achieve some balance with appropriate amendments within a high density / high-rise framework (in some, but not all jurisdictions), it results in significant cost escalation for low density / low-rise housing. Furthermore, imposing a CBC based on a land value percentage (if municipalities charged to the cap) does not provide a clear nexus between the charge and the increase in need for service resulting from the development. If the CBC is expressed as a percentage of land value, then it would be applied as a new municipal tax with no clear relationship between the increased need for service and the land value. OHBA recommends the provincial government remedy these issues via a combination of different amendments to the proposed CBC framework.
-) OHBA recommends that the CBC should only apply to higher density residential development (over 100 residential units/net residential hectare), NOT to low and medium density residential:
- Apply the CBC only to residential development applications (site plan control, zoning bylaw amendment, consent to sever, draft plan of subdivision) for new residential dwellings proposed at a net residential development density of 100 units per net residential hectare or greater.
 - Residential development below 100 units per net residential hectare should only be subject to development charges under the modified *Development Charges Act* AND the *Planning Act* parkland dedication or cash-in-lieu rate (section 51.1) of 5% for residential development.
 - To achieve this outcome, the Ministry would be required to add a new definition to the Regulation for Net Residential Hectare:

“Net Residential Hectare: the area of land measured in hectares for new residential dwellings (including residential lots and blocks) that excludes all retained dwellings, public roads, laneways and widenings, private laneways, public parks and open space, and other public lands.”
 - OHBA recommends that mid-rise developments classified as a maximum of 11-storeys in higher urbanized centres (in keeping with the City of Toronto’s Mid-rise definition in its’ Mid-rise Building Performance Standards) also be exempt from the CBC, and be subject to parkland dedication at the base rates of the *Planning Act* as amended by Bill 108.

OHBA recommends, having restored a number of services back to Development Charges the CBC should be limited to high-rise / high-density and utilized for some community benefits including parkland acquisition up to a maximum cap of 10% of land value.

-) OHBA notes that despite lowering the maximum percentage cap, upper-tier municipalities will maintain municipal revenues due to the restoration of DC eligible services that will move those services from the CBC framework into the Development Charges framework;
-) OHBA believes that the CBC proposal can positively contribute to enhanced accountability, transparency and predictability for higher density development. Eliminating the use of Section 37 agreements, and the proposed imposition of a cap on parkland are positive improvements.
-) Lower and single-tier municipalities would be able to require up to 10% of land value for parkland acquisition through the CBC (high-rise / high density) based on a CBC strategy that is appealable to the LPAT.

OHBA recommends that the appraisal / land valuation date must be moved earlier in the process:

-) For low-rise housing: OHBA recommends that the CBC should *NOT* apply.
-) If, and only if the government fails to adopt this low-rise recommendation, the land valuation date should be moved to Draft Plan of Subdivision phase. The valuation at the building permit stage is too late (after the home is sold) which would capture the value of services installed. More importantly it could also capture the value of the DC's paid upon execution of a development agreement thereby being a new municipal tax upon a DC. OHBA also notes there are significant complications for determining the value of the lot at the permit stage since projects can take multiple years to complete and various lots will have different values (different lot frontages, different lot depths, different products e.g. singles, semi, townhouses and ravine lots, corner lots, end units, oversized lots, pie shaped lots etc). If the CBC is based on a percentage land value cap rather than on a per unit type of charge, there will be fundamental flaws as to its municipal application in a low-rise ground oriented housing setting. To put it bluntly it is a logistical nightmare and should not be applied to low-rise housing.
-) For high-rise / high-density housing OHBA recommends that the value of the CBC be determined well before a project goes to market for sale, and that this be pushed forward to the Municipal Comprehensive Review or Official Plan stage of development for site-specific development sites and where master plan communities are intended, land values should be determined at the time of a re-zoning application or site plan application stage.
-) Not making amendments to the land valuation date adds considerable risk to proponents that a higher than anticipated CBC needs to be applied as an adjustment on closing of the home to the consumer. In the end, the consumer will carry this significant risk on their ability to close. Developers will be forced to adjust prices upwards to reduce risks which will negatively impact housing affordability.
-) Lastly, OHBA recommends that an appeal to LPAT be available to resolve disputes on the valuation of land.

4. Timeline for transition to the new CBC Regime

-) The proposed transition to the CBC regime was initially for January 1, 2021, for which OHBA was supportive in our August 2019 submission, as it would have given municipalities a year transition period to establish their own CBC to be in compliance. Given that it is now four months into 2020 and it may take another couple of months to finalize and pass a CBC regulation, OHBA is supportive of the new Ministry proposal for municipalities to transition to the CBC regime as being one year after the date the proposed CBC regulation comes into effect.
-) A one year transition period should provide sufficient time for municipalities to assess the new CBC methodology, consult on and develop a CBC strategy and pass a CBC by-law.

5. Community benefits charge by-law notice

-) OHBA is generally supportive of the proposed provisions in the Environmental Registry posting that are similar to the notice provisions under the *Development Charges Act* regarding the passage of a development charges by-law.

6. Minimum interest rate for CBC refunds where a by-law has been successfully appealed

- J OHBA is generally supportive of the proposed provisions in the Environmental Registry posting that the minimum interest rate a municipality would be required to pay on amounts refunded after successful appeals would be the Bank of Canada rate on the date the by-law comes into force. Alternatively, if the municipality's by-law so provides, the minimum interest rate would be the Bank of Canada rate updated on the first business day of every January, April, July and October. Consideration should be given to having the interest rate paid for refunds match interest rates payable on unpaid DCs.
- J While not a component of the current regulatory posting, with respect to the interest rate for "frozen" DCs; OHBA is unclear as to why no maximum was prescribed by the Ministry. OHBA is concerned that some municipalities will set unreasonable rates, rather than setting a reasonable rate based on the Construction Price Index or general rate of inflation.

7. Building Code Applicable Law

- J OHBA is generally supportive of the proposed provisions in the Environmental Registry posting that the Building Code be amended to add the community benefits charge authority to the list of items under the definition of Applicable Law. This amendment would establish a mechanism for ensuring the payment of community benefits charges prior to the issuance of a building permit.

8. Other OHBA Comments and Recommendations

- J OHBA recommends that the CBC framework exclude smaller scale medium density residential development of ten units or fewer from the CBC. In order not to capture modest smaller scale new infill developments, particularly those only requiring Committee of Adjustment approvals all new development of ten units or fewer should be excluded. Additionally, this will ensure that in many cases smaller businesses and smaller scale missing middle development are more affordable to renters or new home purchasers.
- J The final regulation must provide greater clarity for on-site parkland dedication. Our members have the ability in some cases to convey parkland in exchange for a credit against the CBC. However, there is a lack of clarity on how this will function and how it is will be evaluated.
- J OHBA recommends that, for the purposes of a community benefits charge, existing Master Parkland Agreements be treated as early payments agreements under the Development Charge legislation, and therefore be exempt.
- J As OHBA understands the proposed CBC framework, the intent is to apply a CBC municipal wide, which differs from the ability of a municipality to charge for 'area specific' development charges. This is a potential flaw in the proposed system. For example, municipalities such as Ottawa have fundamental differences in their DC structures in recognition of different infrastructure needs in different geographical areas (for Ottawa the urban 'inside the greenbelt area' and the suburban and rural 'outside the greenbelt area'). The proposed CBC framework should allow for limited area-specific flexibility or the ability to apply the CBC in some areas while parkland dedication is applied in others.

Conclusion

In closing, OHBA applauds the provincial government for the *Housing Supply Action Plan* that recognizes constraints on housing supply and actions to reduce red tape in order to make it easier to live and do business in Ontario. Now is the time to address the elephant in the room – the fact that by the provincial government’s own projections, Ontario’s population is forecast to grow by an astounding 2.6 million people by 2031. This means, just to keep up with demographic growth that we need 1 million more housing units of diverse types and tenures for #homebelievers in communities right across the province. The CBC framework as currently proposed will only make the current supply/demand imbalance worse if municipalities set their charges at the cap, which will result in fewer homes built in Ontario.

OHBA appreciates the ongoing dialogue with the Ministry of Municipal Affairs and Housing, specifically on the CBC framework and more broadly on the consultation on the *Housing Supply Action Plan*. However, if the proposed CBC framework is applied by municipalities as currently proposed, it will drive higher government-imposed charges on new housing across Ontario. It is therefore critical that the province address the significant issues outlined in this submission and fix the CBC framework.

OHBA would like to highlight and thank our 29 local home builders’ associations across the province that have been engaged in this consultation and many of whom made submissions to the Ministry. OHBA also thanks our numerous member companies that have run financial analysis of the potential fiscal impacts on actual residential projects in different jurisdictions for the proposed CBC framework if municipalities extract the maximum value to the 15% cap. OHBA strongly recommends the Ministry immediately review these member and local HBA submissions from jurisdictions from across Ontario and consider the potential impacts on housing affordability if municipalities apply the current proposed CBC framework and charge the maximum CBC cap on new housing.

OHBA notes that given the ongoing COVID-19 pandemic, that there is tremendous economic uncertainty going forward and it is absolutely critical that the provincial government not add any additional cost burdens into a recessionary business environment onto an industry that may struggle to return to pre-crisis levels of activity. If anything, the provincial government should be working with the industry as part of Ontario’s Action Plan to move forward, to be looking for opportunities to stimulate business investment as soon as Ontario re-opens its doors for business when the crisis subsides. Ontario’s Action Plan for when COVID-19 is contained, must explore further opportunities to address legislative, regulatory and policy actions to reduce costs, increase speed, enhance the mix, and drive innovation in the housing sector. The current CBC regulatory consultation should be viewed as an opportunity to set the stage for getting Ontario’s economy moving again, with a focus on job creation, growth and new housing supply. OHBA looks forward to working with the Ministry to improve the CBC framework to encourage more housing supply and choice for those 2.6 million more #HomeBelievers joining our communities across Ontario.