



Submission

Re: [ERO 026-0315](#) —
Consultation on upper-tier
official plans, secondary plans,
and site- and area-
specific policies

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To: Ministry of Municipal Affairs and Housing, Provincial Planning Branch, 13th Floor, 777 Bay Street, Toronto, ON, M7A 2J3 | PlanningConsultation@ontario.ca

From: Surranna Sandy, CEO, CivicAction | surranna.sandy@civicaaction.ca

On behalf of CivicAction, thank you for the opportunity to provide feedback on upper-tier official plans, secondary plans, and site- and area-specific policies, as well as your interest in our housing affordability efforts.

CivicAction works across the Greater Toronto and Hamilton Area (GTHA) and beyond to turn collaboration into action on the region's most pressing challenges. Through our [Housing Affordability Collaborative](#) and our partnerships driving housing ecosystem transformation and innovation, we bring together leaders across government, business, finance, development, healthcare, nonprofit, philanthropy, and community sectors to advance practical solutions to the workforce housing crisis. We support the Province of Ontario's intent to simplify, standardize, and clarify our planning framework. Done well, these changes can help reduce duplication, improve predictability, and accelerate housing, infrastructure, and economic development.

However, simplification must not only make planning documents easier to read. **It must ultimately leverage the influence of Official Plans on land use, infrastructure development, and zoning bylaws to swiftly enable frictionless delivery of housing that Ontario's critical middle-income workforce can attain and afford, in the communities they serve.**

Released in March 2026 with the voices of hundreds of cross-sector leaders in the housing ecosystem, CivicAction's [Workforce Housing Affordability Playbook for Action](#) shows that the GTHA, as a key driver of Ontario's economy, produces fewer

than 5,000 workforce-affordable homes each year, while requiring roughly 15,000 annually to meet demand. The region is [thus losing the workers who power it](#): healthcare workers, teachers, skilled tradespeople, first responders, and more. This dynamic is a key driver in the crisis in workforce retention, productivity, and prosperity and it has led to the difficulties municipalities face in keeping communities liveable and prosperous.

The Playbook demonstrates that our core barrier is not a lack of land, funding, or goodwill. The challenge is that our current housing system makes partnerships that can deliver affordability difficult. Projects stall when land, capital, approvals, infrastructure, employers, mission-driven partners, and community voices are not aligned effectively or early enough to make projects viable under contemporary market conditions.

Ontario has an opportunity to become a national leader in workforce housing delivery by using this planning reform process to build a predictable, coordinated, and partnership-ready system, benefits of which will bolster the GTHA and all municipalities. We suggest the following system changes.

1. Make workforce housing a clear regional planning priority in upper-tier official plans.

CivicAction supports the Province's direction that upper-tier official plans should focus on regional-scale matters such as growth management, infrastructure and servicing coordination, and cross-boundary land use systems. These are exactly the issues that determine whether workforce housing can be delivered at scale. Upper-tier plans should explicitly identify workforce housing as a regional economic and social infrastructure priority. This means planning not only for total housing supply, but for homes affordable to workers earning approximately 60 to 120 percent of area median income, particularly in sectors that keep communities and local economies functioning like healthcare, education, skilled trades, childcare, and essential services.

This builds on CivicAction's previous submission to the Province regarding updates to the Projection Methodology Guideline to support the implementation of the Provincial Planning Statement (ERO 025-0844), where we recommended that housing projections define affordability needs, link growth choices to workforce housing targets, and direct density to places where workers need housing most.

We recommend that upper-tier official plans include:

- regional workforce housing targets linked to employment growth, income levels, and affordability needs;
- alignment between housing growth, infrastructure planning, transit, and major employment areas;
- clear expectations for how lower-tier municipalities will support workforce housing through zoning, approvals, public land, and infrastructure coordination; and
- metrics that track not only units approved, but units started, completed, affordable to target income bands, and located near jobs and transit.

The true measure of success would not be the number of homes approved on paper but the number of workers who can secure suitable and affordable homes near the communities they serve.

2. Use secondary plans to de-risk complex workforce housing opportunities.

Secondary plans, through their hyper-local focus, support intentional planning around major employment hubs and the housing and transit opportunities for the workers who power these areas. CivicAction recommends that the Province prioritize secondary plans for areas where coordinated planning can unlock workforce housing delivery, including:

- major transit station areas;
- strategic growth areas;
- employment districts and mixed-use redevelopment areas;
- hospital, post-secondary, and institutional employment districts;
- public and institutional land opportunities;
- large underused commercial or employment lands suitable for mixed-use intensification; and
- new communities where infrastructure, schools, services, and workforce housing must be planned together from the beginning.

We support the idea of organizing secondary plans as standalone documents, provided they remain clear, accessible, and connected to infrastructure and implementation planning. Standalone documents could improve transparency and usability for communities, developers, employers, mission-driven housing providers, and capital partners.

The key test of success should be whether secondary plans better align development and redevelopment policies with the needs of residents who live in or work in the areas they cover. Incentivizing growth policies that deliver mixed-income housing and diverse housing typologies around major employment centres and transit areas will be essential to ensure workers can afford to access the communities they power.

3. Standardize planning tools while preserving the ability to respond to local conditions.

CivicAction supports greater consistency across municipalities. A standardized framework can reduce duplication, improve investor confidence, lower transaction costs, and make it easier for partners to replicate successful workforce housing models across the GTHA and Ontario.

At the same time, standardization should not remove flexibility to respond to local housing needs, infrastructure realities, important partnerships, community priorities, and employment patterns. The goal should be: “standardized enough to scale, flexible enough to work”.

The Province should establish transition principles for existing secondary plans and site- and area-specific policies that:

- preserve existing development permissions where they support viable workforce housing outcomes;
- reduce duplication between upper-tier and lower-tier plans;
- protect legitimate local and community objectives;
- identify outdated policies that create unnecessary barriers to housing delivery;
- prioritize updates in areas with strong workforce housing potential; and
- require regular review against housing, infrastructure, and affordability outcomes.

This would help ensure that reform does not simply reorganize planning documents but actively improves delivery conditions.

4. Build risk-sharing and accountability into the planning framework.

CivicAction’s Playbook identifies seven essential partners required to deliver workforce housing: capital providers,

development experts, public partners, mission stewards, demand anchors, Indigenous communities and organizations, and community voices. The Playbook's core lesson is that workforce housing becomes more viable when risk is allocated to the partners best positioned to manage it, and when governance, accountability, and performance expectations are clear from the start.

Ontario's planning reforms can help create those conditions. Upper-tier official plans and secondary plans should be designed to give essential partners greater certainty on:

- where workforce housing is expected and encouraged;
- what infrastructure is required and when it will be delivered;
- what approvals pathway applies;
- what affordability outcomes are expected;
- how public land or institutional land can be activated;
- how employers and other demand anchors can support project viability; and
- how success will be measured.

This clarity will reduce financing uncertainty, improve underwriting confidence, shorten timelines, and make it easier for governments, developers, employers, non-profit partners, and capital providers to move from one-off projects to repeatable models.

5. Position Ontario as a leader in workforce housing delivery

Ontario has land, capital, talent, employers, institutions, and development expertise to lead the country on workforce housing. What is missing is a system that makes coordinated delivery easier, faster, and more repeatable.

The province can take an important step toward that systems change by embedding workforce housing into regional planning, using secondary plans to unlock complex opportunities, standardizing tools across municipalities, and creating clearer pathways for partnership and risk-sharing. Ontario can help bring workforce housing to market faster, at greater scale, and demonstrate a national model for coordinated housing delivery.

This is not just a housing matter. It is a healthcare, labour market, productivity, and regional and national competitiveness matter. When nurses, teachers, tradespeople, PSWs, childcare workers, essential service workers, and more cannot afford to live

near the communities they serve, the costs are felt across the province and country.

We encourage the province to use ERO 026–0315 as an opportunity to move beyond planning simplification toward affordable housing delivery transformation, to improve ownership and rental options alike. Ontario can become a leader in building the systems, standards, partnerships, and accountability to deliver workforce housing in the GTHA and across the province.

CivicAction stands ready to work with the province, municipalities, employers, developers, capital providers, community leaders, and mission-driven organizations to help bring these recommendations to life.

Sincerely,

Surranna Sandy
Chief Executive Officer
CivicAction