

# No to Urban Boundary Expansion: Halton Region Is Not Hamilton, but Still Challenges Provincial Directives for 30-Year Land Supply



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## Report Prepared by:

Frank Clayton, Ph.D.  
Senior Research Fellow

with assistance from

Lana Marcy, M. Pl.  
Research Assistant

\*The opinions expressed in this research report are those of the authors only and do not represent the opinions and views of either CUR or Toronto Metropolitan University.

## Contact

Centre for Urban Research and Land Development,  
Toronto Metropolitan University  
350 Victoria Street, Toronto, ON M5B 2K3  
E-mail: [cur@ryerson.ca](mailto:cur@ryerson.ca)

## Executive Summary

This paper examines the degree to which the recent decision by the Council of Halton Region ("Halton") regarding future regional housing and land needs during 2021-2051 is compliant with the directives of the Provincial Government.

A significant finding from our research is that Halton has a much larger supply of designated greenfield land than does the City of Hamilton ("Hamilton"). Still, both Hamilton and Halton need to replenish their greenfield lands if they are to accommodate the mix of new housing required under the policies of *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (2020) ("the Growth Plan") to accommodate growth to 2051. By deliberately understating the need for more lands to accommodate ground-related housing types, both municipalities are exacerbating the affordable housing challenges already faced by residents within the larger Greater Golden Horseshoe ("GGH").

Halton has previously demonstrated its ability to produce more housing than it has in recent times. The Region's share of housing starts in the Toronto census metropolitan area ("CMA") dropped from 12% in 2001-2005 to 9-10% in 2011-2020.

The sluggishness in converting designated greenfield lands into serviced sites in Halton appears due to inertia in the planning system, and differences between municipalities and developers on the appropriate housing types, densities and the financial front-ending of major infrastructure.

We know that Halton fails to regularly monitor its supply of short-term land by dwelling type in greenfields and built-up urban areas as required under Policy 1.4.1 b) of the *Provincial Policy Statement*. Under this policy, municipalities like Halton must maintain at all times an inventory of short-term land with servicing capacity to accommodate a minimum of three years of market-based demand by dwelling type.

## Background

This paper examines how recent policy decisions by the Council of Halton Region ("Halton") regarding future housing and land needs in the region during 2021-2051 are not compliant with the Provincial Government's directives. We also compare the Halton Council's recent decision against expanding their urban planning boundaries to incorporate additional greenfield lands with the decision of the City of Hamilton Council ("Hamilton") in November of last year not to expand its urban boundary.

### **Forecasting housing needs by dwelling type: the Provincial directives**

Municipalities within the Greater Golden Horseshoe ("GGH") are preparing Municipal Comprehensive Reviews to plan for the accommodation of future population and employment growth for 2021-2051 in accordance with forecasts and policies in *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (2020) ("the Growth Plan").<sup>1</sup> The Growth Plan policies for accommodating residential development entail a combination of intensification (adding more units in the existing built-up area)<sup>2</sup> and expansion beyond the current built-up boundary onto fringe vacant lands ("greenfields")<sup>3</sup> in upper-tier and single-tier municipalities.<sup>4</sup>

1 The Municipal Comprehensive Review ("MCR") is a process municipalities such as Halton Region must follow to ensure their Official Plans conform with policies in the Growth Plan. The Ministry of Municipal Affairs and Housing has set July 1, 2022, as the deadline for municipalities to complete their MCR and Growth Plan conformity exercise.

2 The Growth Plan refers to this area as the delineated built-up area. It is based upon boundaries as they were set in 2006. A minimum of 50% of residential development in Halton Region is to occur in the delineated built-up area (called the minimum intensification target).

3 The Growth Plan refers to these lands as designated greenfields. A minimum density of 50 residents and community jobs is to be achieved by Halton Region (called the minimum density target).

4 All new residential development planned for the city of Toronto must be done through intensification.

**In addition, upper- and single-tier municipalities, including Halton, have been instructed to adopt a market-based approach to forecasting housing needs by dwelling type and density, subject to planning for a minimum of 50% of new housing being located in the existing built-up area.<sup>5</sup>**

Market-based, in this case, means considering the housing demand of both current and incoming residents. Upper-tier municipalities such as Halton and single-tier municipalities such as Hamilton are required to forecast housing needs by dwelling type and project land requirements utilizing a land needs assessment methodology published by the Ministry of Municipal Affairs and Housing ("MMAH").<sup>6</sup>

Key components of this methodology relevant to our analysis include:

- Formulate baseline housing needs scenarios by dwelling type to establish a supply of housing in accordance with market-based demand, subject to adjustments to conform to the Growth Plan policies;
- Calculate forecasts of the household growth based on the 2051 population forecasts of Schedule 3 of the Growth Plan. This is to consider population by age groups and the propensities of the people in each age group to form households (note: households and occupied dwelling units are the same) and calculate the growth from 2021;

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<sup>5</sup> Ministry of Municipal Affairs and Housing (2020). "A Place to Grow: Growth Plan for the Greater Golden Horseshoe, Office Consolidation, 2020." [Online].

Available at: <https://files.ontario.ca/mmah-place-to-growoffice-consolidation-en-2020-08-28.pdf>. In addition to a minimum intensification target of 50%, municipalities Halton Region are also expected to achieve a minimum density target of not less than 50 residents and community area jobs on greenfield lands.

<sup>6</sup> Ministry of Municipal Affairs and Housing (2020). "A Place to Grow: Growth Plan for the Greater Golden Horseshoe: Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020)." Online. Available at: <https://files.ontario.ca/mmah-land-needs-assessment-methodology-en-2020-08-27-v2.pdf>.

- Disaggregate total household growth by type of dwelling unit. At a minimum, the dwelling types should include single detached and semi-detached houses, row ("townhouses") and apartments;
- Adjust the household growth by dwelling type for factors such as the replacement of units lost from the existing stock (e.g., demolitions), changes in the level of vacancies and market contingencies to create a total housing need by dwelling type;
- Allocate a minimum of 50% of the housing need by dwelling type to the delineated built-up area;
- Allocate housing by dwelling type to existing designated greenfield lands in the urban planning area at a minimum density of 50 residents and community jobs (retail, schools, medical, etc.);
- Adjust the market-based housing supply mix to achieve a minimum of 50% of new housing accommodated in the delineated built-up area. The methodology states the ability to provide a market-based supply of housing should be done to the extent possible, as a market-based supply is important in determining whether the 2051 population target can be achieved;
- Designate additional greenfield lands for housing to the extent that market based demand as adjusted cannot be accommodated in the delineated built-up area or the existing greenfield area; and
- Designate all land required by the year 2051 to avoid shortages that would drive up the price of land necessary for housing provision.

## Halton's Council chooses not to expand its greenfield land supply at this time even though more lands are needed by 2051

On February 16, 2022, Halton voted in favour of a modified preferred growth concept for future housing and land needs over the 2021-2051 period.<sup>7</sup> The growth concept was a modification to the scenario forecast in the land needs assessment prepared by Hemson Consulting, which concluded the Region should designate an additional 1,120 hectares of greenfield land to accommodate the housing demand to 2051.<sup>8</sup>

Despite Hemson's findings, Halton's Regional Council voted not to consider an expansion of its urban boundaries, delaying any consideration of adding more greenfields until the next statutory five-year review of its Official Plan.

This modification to the preferred growth concept presented by Halton's land needs assessment consultant does not comply with the Province's directives and conflicts explicitly with the final component of MMAH's methodology as described above.

## Hamilton previously “voted no” to any expansion of its urban boundary at this time

In November 2021, Hamilton voted against any expansion of the City's urban boundaries. The decision ignored the warnings of the City's consultant (Lorius and Associates) about the

7 Halton Regional Council (2022). “Notice of Motion: Modified Preferred Growth Concept, February 16, 2022.” [Online] Available: <https://edmweb.halton.ca/OnBase-AgendaOnline/Documents/ViewDocument/Notice%20of%20Motion%20-%20Modified%20Preferred%20Growth%20Concept.doc.pdf?meetingId=4299&documentType=Agenda&itemId=121872&publishId=71683&isSection=false>

8 Hemson Consulting (2022). “Preferred Growth Concept Land Needs Assessment.” Prepared for the Region of Halton. [Online]. Available: <https://www.halton.ca/getmedia/c4bc5320-ca9a-42c0-9d78-50e73d6ad504/LPS-ROPR-PGC-Report-Appendix-A-Land-Needs-Assessment.aspx>. Hemson Consulting is a well-known firm which has prepared numerous demographic employment and housing forecasts for the Ministry of Municipality Affairs and Housing and for municipalities. The firm prepared detailed forecasts for the Golden Horseshoe in 2005, 2012, and 2021 for the Ministry.

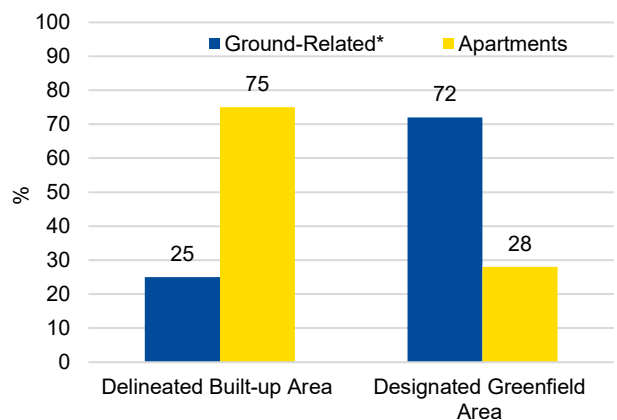
ramifications of adopting an intensification target (the proportion of all new housing built in the existing built-up urban area) of more than 50%. As a result, the intensification target in the 'no urban expansion' scenario is 81%, far beyond the upper limit of a market-based scenario.<sup>9</sup>

The adoption of no urban boundary expansion by Hamilton is in significant conflict with the Province's directives and ignores all but the second component of the methodology as described above.

## Apartments are the dominant type of new housing in built-up areas; ground-related homes dominate greenfield land development

Figure 1 shows the significant difference in the types of new housing anticipated to be built in the existing urban area boundary (built-up area) and the designated greenfield area in Halton over the next three decades.

**Figure 1: New Housing Units by Growth Plan Policy Areas, Halton Region, Percent Distribution Units, 2021-2051**



\*Ground-related = single detached and semi-detached houses and townhouses. Source: CUR, based on Hemson Consulting

9 Two CUR papers provide more background on Hamilton's land needs assessment exercise: Frank Clayton (2022). “Most Hamiltonians Do Not Oppose an Expansion of the City's Urban Boundary.” Centre for Urban Research and Land Development. [Online] Available: [https://www.ryerson.ca/content/dam/centre-urban-research-land-development/CUR\\_Hamilton\\_Survey\\_Expansion\\_Urban\\_Boundary\\_Feb\\_2022.pdf](https://www.ryerson.ca/content/dam/centre-urban-research-land-development/CUR_Hamilton_Survey_Expansion_Urban_Boundary_Feb_2022.pdf); and Frank Clayton (2021). “Forecasting Housing Needs to 2051: York Region Is Credible, Hamilton Is Not.” Centre for Urban Research and Land Development. [Online] Available: [https://www.ryerson.ca/content/dam/centre-urban-research-land-development/CUR\\_Forecasting\\_Housing\\_Needs\\_2051\\_York\\_Region\\_Is\\_Credible\\_Hamilton\\_Is\\_Not\\_Oct.2021.pdf](https://www.ryerson.ca/content/dam/centre-urban-research-land-development/CUR_Forecasting_Housing_Needs_2051_York_Region_Is_Credible_Hamilton_Is_Not_Oct.2021.pdf).

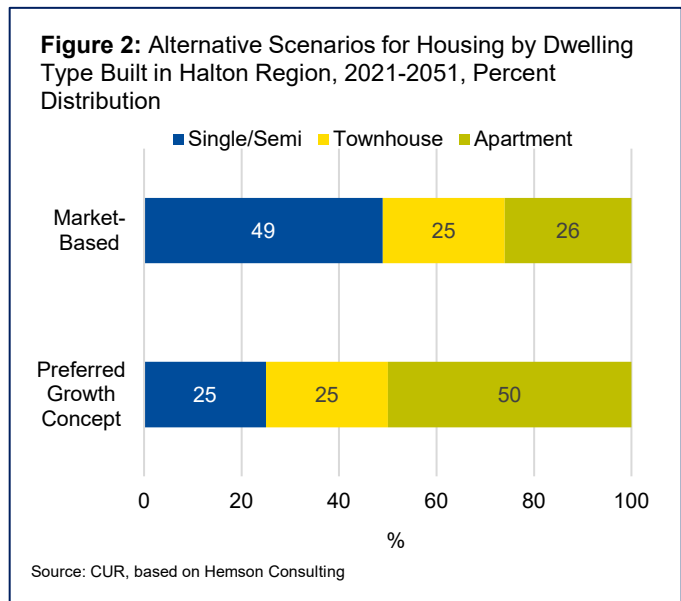
The housing mixes are:

- In the existing urban area, 75% of all new housing is expected to be apartments; and
- In the greenfield area, 72% of all new housing is anticipated to be ground-related housing (singles, semis, and townhouses).

Halton forecast of the housing mix in its greenfield areas has a noticeably larger share of apartments (28%) than most municipalities. In Hamilton, for example, only 6% of the new housing on greenfield lands is expected to be apartments. The reason is that the Province's delineated built-up area is based on 2006 boundaries. Halton Region has seen considerable apartment development on greenfield lands designated as Strategic Growth Areas. These areas should be treated the same as the built-up area lands when planning for growth, but they are currently omitted.

**Policies in the Growth Plan result in a marked shift from single-detached houses to apartments in the Region 2021-2051**

The market-based needs scenario does not consider specific policies of the Growth Plan encouraging intensification of the delineated built-up area and densification of the greenfield area. Hemson Consulting anticipates that under its market-based scenario, 50% of housing needs over the 2021-2051 period in Halton would be single-detached and semi-detached houses and 25% would be townhouses - for a total of 75% ground-related homes (see Figure 2). Apartments would account for just one quarter of the overall need in the region.



Hemson's preferred growth concept applies the Growth Plan's minimum requirement to build at least 50% of all new housing in the delineated built-up area. This results in a significant shift away from single-detached houses to apartments.<sup>10</sup> The share of apartments in the overall mix of housing doubles to 50% from 26% under the market-based scenario, while the percentage of single-detached homes drops by half, to 25% from 50% of the market-based scenario.

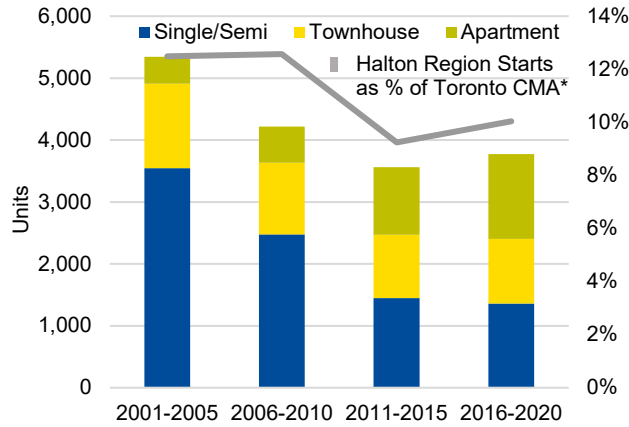
**Housing starts in Halton Region during the past decade much lower than in 2001-2005**

Figure 3 shows housing starts by dwelling type in Halton Region at five-year intervals from 2001 to 2020. It also presents total starts in the Region as a percent of the Toronto census metropolitan area (CMA).<sup>11</sup>

<sup>10</sup> While the preferred growth concept nominally applies a 45% intensification rate for the built-up area, effectively it is 50% when apartments in the Strategic Growth Areas are brought in. Council approved a modified preferred growth plan that looked at housing need to 2041 only and excluded any expansion of the urban boundary at this time.

<sup>11</sup> Three of Halton Region's local municipalities form part of the Toronto CMA. Burlington is part of the Hamilton CMA.

**Figure 3: Halton Region Average Annual Housing Starts by Dwelling Type and Five-Year Periods, 2001-2020**



\*CMA = Census Metropolitan Area, three of Halton's four municipalities are part of the Toronto CMA. Source: CUR, based on data from CMHC

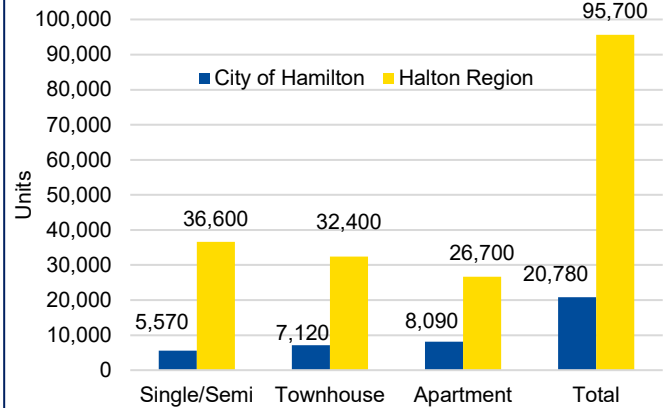
Historically, Halton has been a more important provider of new housing than it was over the last decade. Its total starts during 2011-2020 averaged fewer than 3,700 per year compared to 5,344 units per year in 2001-2005. The region's share of the larger Toronto region fell from 12% to 9-10%.

Most of the housing built in the region over the past two decades have been ground-related home. While apartment starts have increased, ground-related housing still accounted for almost two-thirds of all Halton starts in 2016-2020.

**Halton region has a much larger supply capacity in its existing designated greenfield lands than Hamilton**

Figure 4 presents the capacity of existing greenfield designated lands by unit type available to accommodate new housing in both Hamilton and Halton. When comparing the designated greenfield land inventories, it is important to provide context by comparing the future housing needs of the two municipalities. According to the land needs assessment consultants, the anticipated need for new housing in Halton between 2021 and 2051 is 175,800 units, or 59% more than the 110,300 units forecast for Hamilton.

**Figure 4: Current Land Supply by Dwelling Type in Designated Greenfield Areas, Halton Region and City of Hamilton, 2021**



Source: Hemson Consulting (Halton), Lorus & Associates (Hamilton)

Highlights include:

- **Singles/semis:** Halton has a supply of existing greenfield lands for 36,600 units, 557% more than Hamilton's 5,570 units;
- **Townhouses:** Halton has a supply of greenfield lands for 32,400 units, 355%, more than Hamilton's 7,120 units; and
- **Apartments:** Halton's existing greenfield lands can accommodate 6,700 units or 234% more than Hamilton's 8,090 units.

The bottom line is Hamilton faces a severe greenfield land crunch much sooner than Halton.

**An important question: why is Halton not bringing existing greenfield lands to the market much more quickly?**

Considering its sizable inventory of greenfield designated land, especially for new singles/semis and townhouses, which are currently in short supply, it is surprising that Halton has not introduced more land to the housing marketplace. Moreover, it has demonstrated that it could do so in the past (see Figure 3).

The sluggishness in converting designated greenfield lands into serviced sites in Halton appears due to inertia in the planning system, and differences between municipalities and

developers on the appropriate housing types, densities and the financial front-ending of major infrastructure.

CUR is undertaking a separate analysis of factors behind the sluggishness of the greenfield land supply in Halton Region when ground-related housing demand has been strong.

**Both Councils are disregarding the Province's directives to designate enough lands to accommodate housing needs by dwelling type up to 2051**

It is surprising that both Hamilton and Halton made decisions that are not consistent with Provincial policy to plan to accommodate longer-term housing needs by dwelling type, subject to the minimum intensification and densification policies in the Growth Plan.

**Both Councils also ignore the strong preference for ground-related homes and the low substitutability of ground-related homes and apartments**

Implicitly, the two council decisions assume many households preferring a ground-related home will instead live in an apartment over 2021-2051. As is shown below, with the robustness of the demand for ground-related homes. Many of these households are more likely to opt for a ground-related home in more distant municipalities where housing prices are lower.

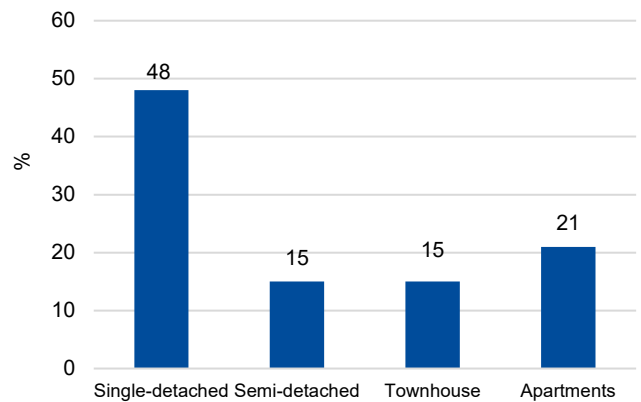
In this regard, a recent survey done for Scotiabank found that Ontario residents are most likely to consider moving or buying a home out of the city to get more for their money, compared to other provinces.<sup>12</sup>

**Dwelling type preferences of GTA households intending to buy a home within two years**

There is a strong underlying preference for ground-related homes, especially for single-

12 Scotiabank (2022). "Infographic: Aspiring homeowners putting off purchase, heading to suburbs, poll find." [Online] Available: <https://www.scotiabank.com/ca/en/about/perspectives.articles.economy.2022-04-scotiabank-housing-poll.html>.

**Figure 5: Type of Housing Most Likely to Purchase, Likely Home Buyers, Greater Toronto Area, Fall 2021\*, Percent Distribution**



\*Does not add to 100% due to rounding  
Source: Ipsos survey for TRREB, Market Year in Review and Outlook, 2022

detached houses, among GTA households in 2021 stating an intention to buy a home within the next two years. This preference is apparent in the latest Ipsos survey conducted for the Toronto Region Real Estate Board.<sup>13</sup>

Figure 5 shows the type of housing intended GTA buyers in 2021, including first-time and repeat buyers, say they are most likely to buy within the next two years. Six consecutive annual surveys have produced similar results.

About 80% of respondents intend to buy a ground-related home, with nearly half of all respondents intending to buy a single-detached house. Only 20% stated a desire to buy an apartment. These data are for the entire GTA, including the City of Toronto, where the intentions to purchase apartments are highest.

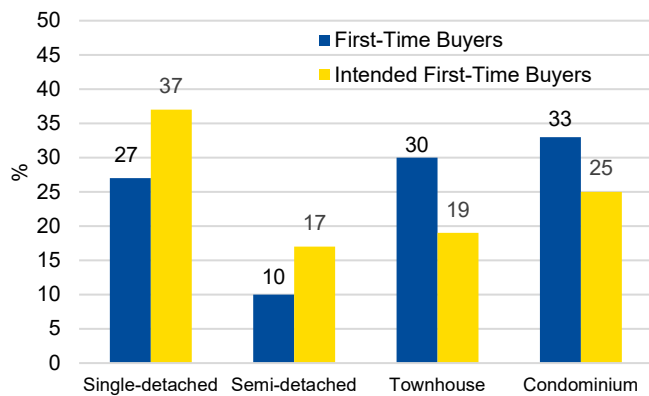
**Types of homes purchased by GTA first-time buyers**

A survey of first-time buyers in the GTA (approximated by the Toronto census metropolitan area) conducted in early 2021 shows a preference for ground-related homes.

13 Toronto Regional Real Estate Board (2022). "2022 Market Outlook & Year in Review. The Post-Pandemic Future: Communities, Housing and Employment." [Online] Available: [https://indd.adobe.com/view/ce62a7f5-525e-4321-a652-c15bb46bc88b?start-page=1&utm\\_source=website&utm\\_medium=button&utm\\_campaign=MYIR+2021](https://indd.adobe.com/view/ce62a7f5-525e-4321-a652-c15bb46bc88b?start-page=1&utm_source=website&utm_medium=button&utm_campaign=MYIR+2021).



**Figure 6: First-Time Homebuyers and Intended Buyers and Intended Buyers by Dwelling Type, GTA\*, Early 2021 Percent Distribution**



\* GTA approximated by the Toronto census metropolitan area  
 Source: CUR, based on Sagen survey of first-time buyers for Royal LePage.

Two-thirds of all first-time buyers surveyed by Environics Research for Sagen and Royal LePage bought a ground-related home.<sup>14</sup> The remaining third purchased an apartment. Another notable difference is that about the same percentage of first-time buyers bought townhouses as bought single-detached houses.

The Sagen/Royal LePage survey also collected responses from households stating an intention to buy a home. When comparing actual and intended buyers, there is a difference between the preferred dwelling type and purchased. While nearly half of intended buyers prefer a single-detached or semi-detached house, only 37% bought them, with more opting for either a townhouse or an apartment.

This suggests that some first-time buyers defer their desire for a single-detached or a semi-detached house. Instead, they buy a townhouse or an apartment for their first home. Many, however, move further afield to buy a ground-related home that is more affordable.

14 For more information on the survey, see Royal LePage (2022) "Increasing number of Canadians anxious about missing out on their first home due to an insufficient down payment." [Online] Available: [https://www.royallepage.ca/en/realestate/news/increasing-number-of-canadians-anxious-about-missing-out-on-their-first-home-due-to-an-insufficient-down-payment/#\\_ftn1](https://www.royallepage.ca/en/realestate/news/increasing-number-of-canadians-anxious-about-missing-out-on-their-first-home-due-to-an-insufficient-down-payment/#_ftn1).

## Conclusions

This paper examines the degree to which the recent decision by the Council of Halton Region ("Halton") regarding future regional housing and land needs during 2021-2051 is compliant with the directives of the Provincial Government.

A significant finding from our research is that Halton has a much larger supply of designated greenfield land than does the City of Hamilton ("Hamilton"). Still, both Hamilton and Halton need to replenish their greenfield lands if they are to accommodate the mix of new housing required under the policies of *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (2020) ("the Growth Plan") to accommodate growth to 2051. By deliberately understating the need for more lands to accommodate ground-related housing types, both municipalities are exacerbating the affordable housing challenges already faced by residents within the larger Greater Golden Horseshoe ("GGH").

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We know that Halton fails to regularly monitor its supply of short-term land by dwelling type in greenfields and built-up urban areas as required under Policy 1.4.1 b) of the *Provincial Policy Statement*. Under this policy, municipalities like Halton must maintain at all times an inventory of short-term land with servicing capacity to accommodate a minimum of three years of market-based demand by dwelling type.

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