

April 29, 2022

Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

****SUBMITTED ELECTRONICALLY****

RE: Environmental Registry of Ontario Posting 019-5286: Opportunities to increase missing middle housing and gentle density, including supports for multigenerational housing

Please accept this letter in response to Environmental Register of Ontario (ERO) proposal 019-5286, which is seeking input on how to diversify housing choices in existing neighbourhoods through gentle density and increases to Ontario's missing middle housing, including encouraging multigenerational housing solutions. Staff have reviewed the discussion questions posed in ERO Posting 019-5286 and offer the following comments.

Proposal Summary

Staff understand that ERO Posting 019-5286, which is to be implemented through the introduction of More Homes for Everyone, has a goal of introducing targeted policies for the immediate term that would make accessing housing fairer for working Ontarians, and make it faster to build appropriate homes for families. Further, it is our understanding that any specific policy proposals to address these housing matters would be consulted on before the government makes any changes; we welcome and look forward to participating in meaningful consultation on any future proposed changes.

Comments

Generally, staff are supportive of the Province's initiatives to assist in the creation of more missing middle and multigenerational housing units through intensification of existing neighbourhoods and the introduction of new types of built form, to support the development of communities that are complete, compact, and transit-supportive. To this effect, the City of Barrie recently adopted a new Official Plan (which is awaiting Provincial approval), which encourages a range and mix of housing types, uses and built form within the existing built-up area, including innovative and non-traditional housing types.

Considering this, we offer the following in response to the discussion questions posed in ERO Posting 019-5286, based on the work we have been doing locally to address housing affordability and access:

- **Barriers and delays to diversifying the types of housing built in existing neighbourhoods**

Existing restrictive zoning, such as standards that require larger lot sizes and limit the types of built form that are permitted within residential zones, continues to be a barrier to diversifying housing forms. The City of Barrie has already addressed a number of these barriers, including introducing new multi-residential uses within many zones (such as stacked and back-to-back townhouses), removing minimum dwelling unit size requirements from zoning for detached accessory units, and making it easier to add additional dwelling units into existing buildings that do not meet today's zone standards. The City also

intends to implement further changes through a comprehensive update to the City's Zoning By-law, pending approval of the new Official Plan by the Province. In this regard, we would encourage the Province to recognize the critical role that timely review and approval of Official Plans and comprehensive Zoning By-laws play in removing barriers to building more and diverse housing.

However, even with more permissive as-of-right zoning in place, infrastructure challenges within older built-up areas (including water, sanitary and stormwater management systems), and the costs associated with upgrading infrastructure and meeting today's Building Code standards, can make small-scale redevelopment or the addition of new units cost-prohibitive for many. There are also challenges with introducing changes or new standards within established neighbourhoods and local resistance is often met, particularly as it relates to concerns over the impact of new types of housing on property values. While staff recognize the importance of community consultation and engagement in the planning process and maintain its importance, the current legislative framework for consultation elevates the voices of neighbouring property owners and often fails to adequately represent those people who will live in the new housing.

- **Changes to the planning and development process to make it easier to support gentle density and build missing middle housing and multigenerational housing, in Ontario**

Many of the changes proposed to date address concerns regarding municipal approval timelines and perceived red tape, however concerns regarding the poor quality of submissions, and the fact that many approved developments have not yet begun construction, remain unaddressed. Clearer standards regarding who is qualified to submit planning justification reports and other studies, could be helpful in increasing quality of submissions, resulting in the need for fewer revisions and a significant improvement in overall approval timelines.

Changes to the planning and development approval process to require timely movement through the approvals process on the part of the applicant could assist in ensuring that projects are approved and built within a shorter timeframe to ensure projects remain financially feasible and up to date with current policies and best practices. Requirements to limit the amount of time an applicant has to revise submissions or move forward with a subsequent site plan application or building permit following initial planning approvals could also free up staff capacity to focus on projects that are acting in good faith to produce more housing, and not merely up-zoning properties in the interest of land speculation or financial gain.

Lastly, the Province is introducing streamlined approval processes for certain classes of development, including affordable housing; further consideration of similar permissions at the local level, respecting matters such as delegated approval authority for minor variances for affordable housing projects, could be considered.

- **Other changes and innovative approaches to land use planning and community building from other jurisdictions that would help increase the supply of missing middle and multigenerational housing**

Subsection 35 (2) of the *Planning Act* currently contains provisions to prevent distinction on the basis of relationship within zoning by-laws, and in essence prevents "people zoning". Notwithstanding this, further changes to ensure that multigenerational housing can be easily built, as well as clearer guidance on requirements and standards, particularly in relation to boarding, lodging and rooming houses, would be welcome. Shared housing, both among multigenerational families and by roommates, remains one of the most affordable housing options within Barrie and the province at large. Unfortunately, this type of

housing is often stigmatized and can be particularly susceptible to NIMBYism, which can pose a barrier to improving standards and consequently the quality and availability of this housing. Additionally, language respecting boarding, lodging and rooming houses in the Ontario Building Code specifically references the number of tenants, which makes it challenging to align with zoning standards.

On a related note, there is currently no ability to zone land based on tenure, which can make it challenging to ensure that enough land is set aside for rental housing. Within the City of Barrie, it is estimated that roughly 75 per cent of rental households are accommodated within the secondary rental market. This points to both a demand for more rental housing and removes ownership units from the market. A review of the laws and regulations respecting smaller-scale condominium corporations in other provinces, such as Alberta and Quebec, would also be encouraged to determine whether there is an opportunity for changes to Ontario's Condominium Act that may make it easier to build smaller-scale, more affordable, missing-middle ownership units.

Lastly, the creation of affordable market housing units remains a challenge to realize, particularly for those that are family-sized, despite this being a matter of provincial interest and the introduction of local affordable housing targets. To introduce more options for market developers to make meaningful affordable housing contributions and meet local policy objectives, the introduction of guidelines for establishing a cash-in-lieu of affordable housing units option (outside of inclusionary zoning areas) could be explored. This approach has been particularly successful in places such as Seattle, Washington, where they have funded workforce housing through an affordable housing linkage fee to preserve and create affordable housing.

Thank you for providing the opportunity to comment on this proposal.

Respectfully,



Michelle Banfield, RPP,
Director of Development Services

cc: Bala Araniyasundaran, P.Eng, PMP, General Manager of Infrastructure and Growth Management
Wendy Cooke, Clerk