

November 24, 2022

Ministry of Municipal Affairs and Housing
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Sent via email: PlanningConsultation@ontario.ca

Public Works

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Re: ERO 019-6197 – Proposed Changes to Ontario Regulation 299/19: Additional Residential Units

Thank you for the opportunity to review and comment on the Environmental Registry of Ontario postings with respect to the proposed changes to Ontario Regulation 299/19: Additional Residential Units. Please note that the following comments and recommendations are provided by Region of Peel staff and may be considered by Regional Council for endorsement. If additional or differing comments are provided through a Council resolution, they will be forwarded to the Ministry for consideration.

General Comments

The Region of Peel appreciates the Province's efforts to increase housing supply and improve affordability. These are important issues that require integrated solutions. We also appreciate the need to make changes to streamline planning approvals and the delivery of housing. However, some proposed amendments would create significant impacts and unintended consequences. For example, some changes could create obstacles to the efficient delivery of infrastructure and services to meet projected demands and potentially affect the ability of municipalities to provide the necessary services to support housing development, without adversely impacting efforts to respond to the climate emergency provincial priority.

Should Bill 39 come into effect, we welcome the opportunity to work with the Provincially-appointed facilitator for Peel to move forward on common objectives and participate in any further consultations to improve service delivery.

Addressing the Missing Middle

Regional staff generally support efforts to limit exclusionary zoning and permit "as of right" residential housing up to three units per lot but only in strategic growth areas (such as major transit station areas and urban growth centres). Overall, this change could create more housing options and support intensification.

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Some “as of right” provisions could be supported in other areas pending further studies demonstrating the availability of infrastructure and services to support housing that includes units that are affordable to low- and moderate-income households.

Recommendation

When permitting “as of right” densities, Regional staff recommend that additional considerations such as impacts on the transportation network and public health be considered.

Higher Density Around Transit (MTSAs)

Requiring municipalities to implement “as of right” zoning for transit supportive densities in specified areas around transit stations and extending requirements to zoning by-laws may pose a challenge to planning for infrastructure if the expected densities in these areas are unclear.

Securing more housing options, including affordable housing, may be constrained by insufficient community infrastructure to accommodate increased density.

Recommendation

Regional staff recommend that the legislation include stronger affordability requirements and safeguards so that low- and moderate-income households have housing options that are affordable to them. Increased density without requiring or securing more deeply affordable units will not necessarily improve housing affordability.

Conclusion

While more housing options and supply can contribute to improving housing affordability outcomes in complete communities, it is important to put in place a framework to ensure that new and existing housing supply is used for homes (e.g., address vacant units and speculation) to maximize affordability. Efforts must also be made to ensure that new supply is truly affordable to low- and moderate-income families.

All orders of government must work together to increase the supply and longevity of affordable housing and strengthen the capacity of municipalities, industry, and community partners to respond to rapidly growing need while recognizing the continued role of upper-tier municipalities in adequately addressing infrastructure requirements and other planning considerations needed to sustain increased housing targets.

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We trust that the Region's comments will be helpful as the Ministry considers amendments to Bill 23 and related proposed regulations regarding streamlining planning processes and increasing the housing supply.

As related to the intent to Bill 39, a Provincially-appointed facilitator will assess regional government in Peel and determine the best mix of roles and responsibilities between upper and lower-tier municipalities and ensure municipalities are equipped to deliver on the government's commitment to build 1.5 million homes over the next 10 years in order to address the housing supply crisis. The Region is committed to work through this process with the facilitator to find ways to continue to improve coordination and service delivery to support the Province's goal and efforts.

The Region looks forward to continuing to work with the Province, local municipalities, and other stakeholders to meet Ontario's housing needs. I would be pleased to provide any clarifications or additional comments on these matters.

Sincerely,



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