

Friday, December 9, 2022

**To be sent via email to PlanningConsultation@ontario.ca and
minister.mah@ontario.ca**

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
Government of Ontario
17th Floor, 77 Bay St.
Toronto, ON M7A 2J3

Dear Minister Clark,

RE: Proposed Amendment to O. Reg 232/18: Inclusionary Zoning (ERO# 019-6173)

The City of Guelph (the City) welcomes the opportunity to provide comments on the proposed amendment to O. Reg 232/18: Inclusionary Zoning. This submission will provide comments from the City's Planning and Building Services perspective.

The proposed amendments to O. Reg 232/18 would establish an upper limit on the number of units that would be required to be set aside as affordable, set at 5% of the total number of units (or 5% of the total gross floor area of the total residential units, not including common areas). It would also establish a maximum period of twenty-five (25) years over which the affordable housing units would be required to Page 28 of 34 remain affordable. Amendments would also prescribe the approach to determining the lowest price/rent that can be required for inclusionary zoning units, set at 80% of the average resale purchase price of ownerships units or 80% of the average market rent (AMR) for rental units. These proposed amendments would only apply on lands within Protected Major Transit Station Areas (PMTSA).

The City of Guelph has one PMTSA as delineated through OPA 80, and it is the downtown. While the proposed prescribed time frame for affordability could provide certainty, setting it at 25 years does not allow municipalities to consider local needs or provide for affordable units for the long term. While we have not examined the use of this tool in the City of Guelph, staff note that the provision of 5% of units as affordable is very low and is insufficient to make any substantial change to affordability in our community. The requirements to develop and use the program, along with the limited geographic area that it can apply to, and the proposed new program limits make this tool less desirable and less effective than intended.

Review of A Place to Grow and Provincial Policy Statement

The government is proposing to integrate the Provincial Policy Statement and A Place to Grow into a new province-wide planning policy instrument. The stated purpose of this review is to create a new document that:

- Leverages the housing-supportive policies of both policy documents;
- Removes or streamlines policies that result in duplication, delays or burden in the development of housing;
- Ensures key growth management and planning tools are available where needed across the province to increase housing supply and support a range and mix of housing options;
- Continues to protect the environment, cultural heritage and public health and safety; and
- Ensures that growth is supported with the appropriate amount and type of community infrastructure.

The province states that the intent of this consultation is to identify potential opportunities that will complement other provincial priorities and plans.

Staff are reviewing the consultation questions and will be providing a response prior to the December 30 deadline.

The city has been in a constant review cycle over the past 5 years as the province has updated and released multiple amendments/updates to A Place to Grow, modified planning horizons and population targets and released a new Provincial Policy Statement in 2020. Staff are supportive of reducing duplication, removing potentially conflicting policy directions, and providing clarity on matters of provincial interest. A Place to Grow is a prescriptive plan that is challenging for municipalities because it presents one approach to planning for a large geographic area and sets growth targets without consultation with municipalities. Staff would be supportive of greater local autonomy through a combined provincial planning framework that respects local growth constraints and fiscal impacts.

The City is grateful for the opportunity to provide input on this important matter. If you have any questions, please feel free to contact us.

Sincerely,



Krista Walkey, General Manager, Planning and Building Services

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