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## Public Works

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### **Re: Region of Peel Comments on ERO 019-5286 Opportunities to Increase Missing Middle Housing and Gentle Density, including Supports for Multigenerational Housing**

Thank you for the opportunity to review and comment on ERO 019-5286, Opportunities to Increase Missing Middle Housing and Gentle Density, including Supports for Multigenerational Housing. The Region of Peel appreciates the Province's commitment to increasing housing supply and addressing housing affordability, including increasing missing middle housing. Below are comments provided by Regional staff.

The Region looks forward to participating in future consultations given our shared responsibility with the provincial government, lower-tier municipalities, industry partners, and other associations to facilitate the efficient provision of missing middle housing and supports for multigenerational housing.

#### **General comments**

The [draft Regional Official Plan](#) supports complete compact communities in Peel with a range and mix of housing options, including affordable housing and missing middle housing. Local municipalities also have strategies and initiatives to increase missing middle housing, promote gentle density, and support multigenerational housing, including the [City of Mississauga's Housing Strategy](#), [Housing Brampton](#), and the [Town of Caledon's Affordable Housing Strategy](#). These efforts, in tandem with those from the provincial government, industry and other community partners, will help to ensure that Peel has a housing supply that reflects the local need of its large, diverse and growing population.

#### **Discussion Questions**

##### Question 1: What are the biggest barriers and delays to diversifying the types of housing built in existing neighbourhoods?

The Region has a shared responsibility with the Province, local municipalities, industry partners, and other associations to facilitate the efficient provision of housing. While provincial, regional and local municipal plans promote intensification, there are a number of key barriers and delays to diversifying housing in existing neighbourhoods, including:

- Development applicants not providing complete application (e.g., incomplete or insufficient technical studies or not demonstrating contributions towards Regional targets on affordability, rental, and density), which delays planning approvals and/or does not demonstrate the strongest contributions towards housing objectives including a range and mix of housing options and densities. Fewer housing options makes it more challenging for people to be able to age in place or live in the community of their choice.

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- Changes in the Planning Act through Bill 109, More Homes for Everyone Act, 2022 do not reflect the shared accountability of public review agencies and applicants to address matters and move development applications forward. A significant part of the application review timeline includes time required for the applicant to address areas of concern.
- Efforts are being made to better understand why development applicants with subdivision draft approvals or site plan approvals have yet to apply for building permits. Based on local municipal data and Regional estimates, it is estimated that over 30,000 units in Peel Region have received the necessary approvals to apply for building permits and commence construction but have not yet done so. While it is understood that there is a period of time that exists between when units are approved and when construction commences, applicants not adding housing supply in a timely manner despite having the sufficient approvals in place reduces housing options and impacts affordability.
- Development financing is a barrier to redevelopment as it is challenging to finance small scale redevelopment due to the upfront need for a large pool of capital to qualify for development financing.
- Lack of community acceptance of gentle intensification and more housing choices.
- Existing zoning and planning approvals do not always permit missing middle and multi-generational housing, thereby requiring additional time requirement to seek Official Plan and bylaw amendments.
- Urban design guidelines can constrain infill development and intensification.

Question 2: What further changes to the planning and development process would you suggest to make it easier to support gentle density and build missing middle housing and multigenerational housing, in Ontario?

The Region is committed to working with the province, local municipalities, industry, and other community partners to identify tools, policy levers, supports, and changes to the planning and development process that could better support gentle intensification and offer more missing middle and multigenerational housing in Peel.

Suggestions include:

- The Province consider mandating timelines to require developments to commence construction within a certain period after receiving the necessary planning approvals.
- Make it easier for property owners and investors to access financing for small scale redevelopment
- Continued public education and community acceptance of gentle intensification and more housing choices.
- Policy levers and tools outside of inclusionary zoning to require affordable housing and missing middle housing, including outside of major transit station areas.
- Zoning reform to support missing middle housing in areas well served by transit.
- Additional funding for planning staff to be able to more adequately respond to the growing number and complexity of development applications

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- Municipal reviews that examine permissions and processes for missing middle housing and multi-generational housing, including innovative and shared housing arrangements, to better support and reduce barriers to the provision of this housing
- Support missing middle and mid-rise as of right in areas well served by transit provided there is sufficient availability of infrastructure and services. Pre-zoning will provide greater certainty in the planning approvals process, such as which missing middle housing is permitted and where there are relaxed permissions, thereby reducing risks to proposing missing middle and multi-generational housing developments.
- Using the Community Infrastructure and Housing Accelerator tool to prioritize affordable housing, missing middle and multi-generational types of housing
- Increased funding to support the creation or renovation of additional residential units and to encourage developers to include partial additional residential units or rough-ins as part of pre-construction sales.
- Reductions or exemptions from fees and charges for missing middle housing, particularly if there is an affordable housing component, if the development is occurring in an area of population decline or located in an area with established community services and infrastructure.
- Taking advantage of available infrastructure in mature neighbourhoods to accommodate multigenerational families without the need for changes to planning approval processes.
- Identifying strategic locations where gentle density could be added and prioritizing those locations for reducing/streamlining required planning permissions, while giving consideration to available infrastructure.
- Consider opportunities to reduce parking requirements for housing with additional residential units.
- Revise current policies and regulatory frameworks to address existing barriers to creating and financing innovative and alternative housing options.
- Increased funding and incentives and improved cost-sharing arrangements to support the development of permanent affordable housing and incent gentle density (duplexes, triplexes, quadplexes, purpose built rental, additional residential units etc.).
- Ensure urban design guidelines better support vibrant and healthy communities
- Providing Provincial funding directly to support and leverage municipal tools such as Peel's Affordable Housing Financial Incentive Program which provides grants to support the delivery of affordable rental units needed in the community by private and non-profit developers.

Question 3: Are you aware of innovative approaches to land use planning and community building from other jurisdictions that would help increase the supply of missing middle and multigenerational housing?

- Modular housing such as developments recently pursued by the City of Toronto.
- Shared housing arrangements (including initiatives such as Canada HomeShare) and innovative and alternative housing options, such as those pursued in Peel Region and City of Toronto.

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- Continued investment in initiatives, such as the Peel My Home Second Unit Renovation Program, that support renovations to upgrade or legalize an additional residential unit.
- Continued promotion through development applications of additional residential units in detached, semi-detached or townhouse units.
- Easier access to development financing for small-scale developments
- Conversion/extension of existing community sites into residential (e.g., schools that have seen declining enrollment and places of worship).
- Through further consultation, explore unique approaches such as permitting mixed use by adding residential in light industrial areas as has been done in Vancouver and other jurisdictions and promoting non-conventional approaches such as laneway housing (see [City of Vancouver](#))
- Promote unique housing ownership types such as co-operative housing.
- Opportunities to intensify existing affordable housing sites.

### Question 4: Are there any other changes that would help support opportunities for missing middle and multigenerational housing?

- Encouraging development to provide rough in for additional residential units (separate entrances, to building and fire code standards) for all detached and semi-detached units including partial additional residential units or rough-ins as part of pre-construction sales. Where feasible, other design elements such as larger basement windows and providing separate entrances should be considered to support the development of future additional residential units that are safe, legal, and liveable.
- Provincial or federal investment to incentivize affordable components in missing middle projects (e.g., exemption from fees and charges for affordable units), particularly if there is deeper affordability for lower income households. This will facilitate the expansion of affordable supply not only by non-profits but also private infill development.
- More funding for additional residential unit (second suite) regularization to bring units up to code.
- Consider growth in other community needs (e.g., transit, libraries, licensed child care, EarlyON Child and Family Centres, community centres, retail) for all ages as existing neighbourhoods densify.
- Continued investment in partnerships and co-location of housing, including affordable housing, with community services such as licensed child care, EarlyON Child and Family Centres, schools, community centres, libraries and other community services as appropriate (e.g. fire or paramedic stations)..

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### Housing Supply Working Group

The Region, as a key partner in facilitating the efficient provision of housing and service manager for affordable housing, looks forward to participating in the work of the Housing Supply Working Group to support efforts to create more housing supply and improve housing affordability.

While many of its recommendations could reduce barriers to adding housing supply, the Housing Affordability Task Force's report offered a limited response to addressing factors beyond supply such as demand, labour, materials, infrastructure, interest and inflation rates, and investment practices to make housing more affordable. This report, therefore, should not be the sole input into the Province's long-term housing roadmap. Consequently, while increased supply should moderate excessive house price growth, it is key for the Housing Supply Working Group to also examine demand-side solutions and other economic factors and levers.

The Region appreciates the broad range of stakeholders proposed to be engaged as part of the Housing Supply Working Group and stress that consultations with industry partners include community housing providers and related associations. While solutions to housing challenges are found at all levels (municipal, provincial, federal, industry and community), municipalities play a critical role in addressing these challenges as service system managers and through the management and implementation of municipal official plans. Municipal representation and engagement as part of the Housing Supply Working Group is key to the success of adequately increasing housing supply and improving housing affordability.

### Conclusion

The Region of Peel supports the Province's goal of addressing housing supply and affordability, and looks forward to working with the Province and all stakeholders to accelerate the delivery of housing supply and to address housing affordability in Peel Region and across Ontario. Regional staff look forward to participating in future consultations and providing additional comments or clarification as needed.

Please contact me if you have questions or require additional information or clarification.

Sincerely,



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