



Friday, April 29, 2022

PlanningConsultation@Ontario.ca
Ministry of Municipal Affairs and Housing

Dear Ministry of Municipal Affairs and Housing,

Re: Comments from the City of Waterloo: ERO posting 019-5286 “Opportunities to Increase Missing Middle Housing and Gentle Density”

Thank you for the opportunity to provide comments on ERO posting 019-5286 “Opportunities to Increase Missing Middle Housing and Gentle Density.” The government is seeking input on how to diversify housing choices in existing neighborhoods. This consultation is focused on finding ways to support gentle density and increase Ontario’s missing middle housing, including encouraging multigenerational housing solutions. Please accept this letter as the City of Waterloo planning staff’s feedback on this important issue.

Should you have any questions, please do not hesitate to contact us.

Regards,

Michelle and Tanja

Michelle Lee, PhD, CAHP
Senior Policy Planner
Integrated Planning and Public Works,
City of Waterloo
P: 519.747.6068
F: 519.747.8523
E: michelle.lee@waterloo.ca

Tanja Curic, MCIP, RPP
Senior Policy Planner,
Integrated Planning and Public Works,
City of Waterloo
P: 519-747-8745
E: tanja.curic@waterloo.ca



City of Waterloo Comments

Recommendations from the Ontario Housing Affordability Task Force

1. Allow “as of right” residential housing up to four units and up to four storeys on a single residential lot.

Comment: Staff are supportive of the principle of gentle intensification as one means to achieve Provincial Growth targets and are taking steps through the City’s Affordable Housing Strategy to identify opportunities to enable more units on single residential lots. However, staff are not supportive of measures by the Province to remove local decision making authority on how to best advance gentle intensification in the local context, including determining specifically where and how housing targets are to be met, since such measures fail to recognize other important provincial and local planning and growth management objectives and context. The City of Waterloo has comprehensively and strategically planned for growth through planning policy studies with extensive community engagement, which focused on protecting the countryside line, orderly growth and development, having appropriate regard to local planning objectives and contexts, aligning growth with capital infrastructure investments, and achieving Provincial growth targets. In staff’s opinion, local municipalities are best equipped to plan for gentle density in existing low rise residential neighbourhoods, and should have flexibility to do so based on the local context, with broad guiding principles at the Provincial level.

2. Permit “as of right” secondary suites, garden suites, and laneway houses province-wide.

Comment: The City of Waterloo Official Plan (OP) and implementing Zoning By-law include second unit policies substantially consistent with the current Planning Act framework. Under the revised framework, both the OP and Zoning By-law would need to be revised. Staff support in principle gentle intensification through second residential units, but do not support the requirement for municipalities to permit second residential units “as of right” in all locations, since this hinders the municipality’s ability to regulate the uses in order to consider locational constraints (e.g. servicing, flood plain, grading, tree preservation, emergency



response, etc.) and manage impacts (e.g. heritage, parking, setbacks, character, drainage, privacy, land use compatibility, etc.). It is recommended that municipalities be provided sufficient flexibility to establish second residential unit policies and regulations based on locational constraints and management of impacts, in the local context.

Discussion Questions

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

Comment: The City of Waterloo has recently consulted with internal City divisions, private and not-for-profit home builders and the general public to understand barriers that inhibit greater housing diversity in existing neighbourhoods. Barriers identified include:

- Inexperience and prohibitive costs for home owners to construct second residential units (accessory units and those located within the primary building)
- High land values and construction costs that limit financial feasibility of redevelopment in existing neighbourhoods
- Restrictive zoning and Official Plan policies that create additional risk, processing time and costs for the construction of denser housing types in certain existing neighbourhoods (note, the City is working to respond to this through its in-progress Affordable Housing Strategy and Official Plan Review and Update)
- Community opposition to new development and higher density development within existing neighbourhoods

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?

Comment:

- Affordable access to parcel data through Teranet to allow for a more sophisticated housing data analysis and density modeling.
- Greater funding and support of the Ontario Land Tribunal (OLT) to resolve backlogs and promote faster decision making.



- Limiting OLT appeals to those that can demonstrate that a decision is not consistent or in conformity with Provincial, regional or local council plans and policies.
- Improved funding / supports to designated service providers to enable the construction of affordable units in larger sizes that could accommodate multi-generational households that are generally not being provided by the current market.
- Conditional zoning outside of a Community Planning Permit System that would enable additional heights/densities to be provided in exchange for the provision of needed housing types or sizes.
- Revisions to the PPS and Growth Plan that support comprehensive municipal-led planning for gentle density, missing middle housing and multigenerational housing in the local context.
- The ability for municipalities to support gentle density, missing middle housing, multigenerational housing, and affordable housing through grants and other incentives without the need to complete a community improvement plan (re: Section 106 of the Municipal Act).

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?

Comment: See response to Question 2.

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

Comment: See response to Question 2.

Thank you for the opportunity to provide comments on ERO Posting 019-5286.