



# Town of The Blue Mountains

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Via Email (housingsupply@ontario.ca)

February 15, 2022

Hon. Steve Clark  
Minister of Municipal Affairs & Housing  
College Park 17<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M7A2J3

**RE: Opportunities & Feedback to Increase the Supply & Affordability of Market Housing  
Town of The Blue Mountains Submission**

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Dear Minister Clark,

Thank you for your recent email correspondence to municipal Heads of Council on February 7, 2022 seeking further advice from municipalities regarding opportunities to increase the supply and affordability of market housing. Like many municipalities in Ontario, the Town of The Blue Mountains is experiencing significant growth, pressure to grow more, and market housing prices that have vastly outpaced the incomes of so many local residents.

We appreciate your willingness to ask tough questions regarding the current housing crisis and your openness to act swiftly on some of the answers you receive through your consultations. It should be noted that municipal staff and Councils would be better able to provide well-thought out, constructive comments and suggestions with additional time. It is concerning that some innovative thoughts, ideas, and potential needed changes to Ontario's Housing System may not be heard through an accelerated consultation period.

On behalf of the Town of The Blue Mountains, the following represents Town staff's suggested opportunities for the Province's consideration as well as comments pertaining to the Housing Task Force Report Recommendations:

*General Comment* – The Town supports the Province in setting a target for new dwellings to be built. Without a target, neither the Province, nor municipalities will know the magnitude of the goal or how each can do their part in achieving it.

*General Comment* – The Town supports a municipality's ability to deliver a range of housing options that both meet local context and serviceability, while pursuing achievement of provincial priorities, objectives, and policies. Definition of terms such as "missing middle" and "attainable" may assist municipalities in understanding and what we are collectively striving towards.

*General Comment* – The current Planning System in Ontario is multi-tiered, complex and lengthy. In rural and small urban communities, plans, policies, and bylaws can articulate a community’s vision of a sustainable yet prosperous future. However substantial amounts of information that guide development on the ground is left to landowners and applicants to provide for review. This “back-ending” of information to support development proposals results in time and money required for both preparation and review of those materials. The result: a land development process that is often consumed with ground-truthing, review, technical assessment, and professional debate. While detailed information is critical to good decision-making, the current reactive structure does not lend itself to accelerated delivery of market housing. Municipalities need to be equipped to identify and clearly delineate areas that are available for development at the Official Plan and Zoning Bylaw stage. Mandating the use of the Community Planning Permit System may assist in bringing clarity and expediency to the process.

*Suggestion: Pursue Clarity & Predictability* – A new Planning System in Ontario needs to be based on clarity and predictability. Properties that are designated and zoned for uses that are deemed appropriate through Official Plan and Zoning Bylaw processes should be able to realize the community’s vision without further draw-out processes. Similarly, community residents should have the confidence that lands that are designated and zoned for protection will stay that way until the next Official Plan Review and Zoning Bylaw Review without concern that technical evaluations will reveal opportunity for unexpected change.

*Suggestion: Stable & Sufficient Resources to Plan Ahead* – It is recommended that a portion of the Land Transfer Tax collected within a municipality be directed to fund municipal planning and development resources. This approach stabilizes funding for many smaller municipalities. This approach also ensures that municipalities with higher land sale volumes (a potential sign of growth) can benefit from that growth by investing in resources to manage it. Finally, this approach also lessens the burden of municipal planning resources on the tax levy, freeing up much needed tax income to be dedicated to other municipal services.

*Suggestion: Non-primary dwelling surtax to fund Community Improvement Plans* – Seasonal homes, second homes, vacation homes and short-term accommodation units make up a critical mass in the Provincial housing stock. Ontarians should always have the freedom to buy real estate. However, when not occupied as a principal residence by either the owner or a long-term tenant, this housing stock consumes land without helping satisfy the market’s demand for housing. It is recommended that the Province investigate a surtax or unit levy on dwellings that are not used as a principal residence by the owner or a long-term tenant. Legislation could be introduced to require the surtax revenues to support municipal Community Improvement Programs that support attainable housing.

*Suggestion: Attainable Unit Density Offset* – We recommend that the Province allow municipalities to require up to 10% of development proposals over 10 units to be attainable in exchange for a 10% increase in density. Effectively, bonus density can be provided for the attainable housing. This takes advantage of the critical mass/cost efficiency of a development that is already constructing market-priced dwellings.

*Suggestion: Minimum Density Plans* -- To help achieve a provincial goal of dwelling creation, each region and municipality must understand what their respective contribution of new dwellings needs to be in the next 10 years. We recommend that the Province work with planning authorities to identify what the regional and local municipal dwelling targets shall be. The minimum densities required to achieve these dwelling targets should be outlined in Minimum Density Plans for serviced settlement areas with no threat of appeal to the Ontario Land Tribunal. This will ensure the densities required to achieve dwelling targets are put into place in a timely manner and sites are pre-zoned for development.

*Housing Task Force Report Recommendations 3 through 11* – Town staff generally support pursuit of “as-of-right” permissions. We support the Province furthering legislative change to permit two additional residential units on a lot, to a maximum of 3 units. However, we question the liveability of 4 units on a single residential lot. Issues related to amenity space, parking, and waste collection could be exacerbated, particularly in smaller communities with little to no access to transit or public parkland within walking distance. Also, we do not support Recommendation 11 in its entirety as it suggests supporting housing growth outside municipal boundaries and may lead to unnecessary sprawl and premature extension of costly municipal infrastructure.

*Housing Task Force Report Recommendation 12* – We caution against a complete repeal or override of municipal documents that prioritize the preservation of physical character of neighbourhood. However, we acknowledge that character does not equate to “the same”. Municipalities that wish to address character should be required to develop community design standards how development should compliment existing character, albeit at a higher density.

*Housing Task Force Report Recommendation 13 through 25* -- Blanket exemptions of developments <10 units may create unintended confusion regarding critical issues (i.e. infrastructure ownership, access, etc.) and may allow poor quality design. This concept should only be entertained if the Province identified strict requirements outlining the site level details that are typically dealt with through the site plan process. Also, we caution the Province in its consideration of restoring all rights of developers to appeals Official Plans and Municipal Comprehensive Reviews. This could result in additional appeals resulting in further time and money directed towards matters at the Tribunal rather than devoted to building communities.

We do not support automatic approvals of applications that exceed legislative timelines. Often lengthened timelines result from professional differences of opinion over policy interpretation or technical substance. Instead, we recommend the Province engage with professional associations involved in the development process (planners, engineers, etc.) to develop clear and comprehensive criteria for technical information associated with developments.

Thank you again for the opportunity to convey our suggestions and provide feedback. We look forward to further collaboration with the Province and remain available if you require additional information or clarity.

Sincerely,

**The Town of The Blue Mountains**



Nathan Westendorp, MCIP RPP  
Director of Planning & Development Services

cc.	Council	Town of The Blue Mountains
	Shawn Everitt, CAO	Town of The Blue Mountains
	Randy Scherzer, Deputy CAO	County of Grey



# Staff Report

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## Planning & Development Services – Planning Division

**Report To:** Council  
**Meeting Date:** February 28, 2022  
**Report Number:** PDS.22.037  
**Title:** Ontario Housing Affordability Task Force Report  
**Prepared by:** Nathan Westendorp, Director of Planning & Development Services

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### A. Recommendations

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THAT Council receive Staff Report PDS.22.037, entitled “Ontario Housing Affordability Task Force Recommendations – Information Report”;

AND THAT Council direct Town staff to monitor any provincial policy and legislative changes that may be proposed by the Province to address Housing and Affordability issues.

### B. Overview

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This is an Information report to Council regarding Town staff’s response to the Ontario Housing Affordability Task Force Report and additional suggestions Town staff provided to the Province.

### C. Background

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During its February 14, 2022 Council meeting, Town Council considered correspondence from the Minister of Municipal Affairs & Housing. Specifically, the Minister sent correspondence to all Heads of Council within the Province seeking feedback and suggestions regarding opportunities to increase the supply of housing and expand affordability. Staff also provided a high level verbal overview of the Ontario Housing Affordability Task Force Report that was attached to the Minister’s letter.

As background, the Provincial Government struck the Ontario Housing Affordability Task Force in late 2021 to look into the housing and affordability challenges that continue to impact many Ontarians. The Task Force’s process included consultation with various stakeholders involved in the planning, development and housing industries. For more information on the Task Force and its mandate, please refer to Attachment #1.

On February 8, 2022, the Task Force released a report containing fifty-five (55) recommendations for the Provincial government to consider as potential actions to help address housing supply and affordability issues that are very prevalent across the Province. The Minister’s letter to Heads of

Council provided the Town with an opportunity to give feedback on the Task Force Recommendations as well as to offer additional suggested solutions that could also be explored.

Given that the Minister requested municipal feedback to be submitted by Tuesday February 15, 2022, there was insufficient turnaround time for Town staff to provide a thorough analysis of the Task Force Report recommendations through a staff report that could be considered by Council prior to the Provincial deadline. Therefore, Town Council directed staff to prepare a comment letter to the Province on behalf of the Town, with a copy of the letter provided to Council. On February 15, 2022, Town staff provided a letter to the Province outlining primary feedback on the Task Force's recommendations as well as some additional ideas/suggestions for the Province to consider, please refer to Attachment 3.

## **D. Analysis**

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As Council is fully aware, the housing supply and affordability issues in the Province has reached dramatic levels exacerbated by several factors, and the Town is one of several municipal examples where the issues are very prevalent and impactful on current residents, future residents and the local economy. To be clear, there is no single "silver bullet" to address the issues that exist. To effectively address the issues requires a suite of changes to adjust the systems involved in planning, development, building, and financing homes. All levels of government have a role to play in facilitating change. However, because provincial legislation guides how municipalities function and the decisions they make regarding housing, it is critical that municipalities engage the province in constructive dialogue to drive change that municipalities can implement effectively.

The Province has indicated that it is committed to action and it is possible that the Province will move forward on some of the Task Force recommendation in the near future. However, it is important to note that the Task Force's Report is only the first step towards action. They are recommendations at this time and are not yet proposed policy or legislation. Town staff have no indication regarding which, if any, of the Task Force recommendations will be acted upon. As a next step, staff expect that the Province will take the recommendations that are considered actionable and then translate them into proposed policy and legislation. The true impact of the Task Force recommendations will be difficult to fully understand until draft policy and draft legislation is released for further review and comment. It will be critical for the Town to continue to monitor the Province's next actions and provide comments on proposed policy and/or legislation when released for consultation.

Looking ahead, Town staff expect a season of change in the near future which will very likely impact municipal planning documents, processes and possibly, municipal decision-making. The Town's Official Plan Review process naturally offers the opportunity (if needed) to integrate proposed changes in Provincial policy into an updated Official Plan in the future. As noted above shifts in provincial policy direction and legislation will need to be assessed in the future by Planning staff to fully understand how the Official Plan Review workplan and timelines could be impacted. Depending on the scale of the policy and/or legislation changes the Province brings forward, it is possible that Phase One of the Official Plan Review Project may not be complete before the municipal election in Fall of 2022. The Planning Division remains well

positioned to continue to evaluate the impacts of future Provincial actions, policies and legislation on the Town. Under the leadership of Trevor Houghton, Manager of Community Planning, alongside Shawn Postma, Senior Policy Planner, the Planning Division will monitor these matters and report back to Council accordingly.

## **E. Strategic Priorities**

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### **1. Communication and Engagement**

We will enhance communications and engagement between Town Staff, Town residents and stakeholders

### **3. Community**

We will protect and enhance the community feel and the character of the Town, while ensuring the responsible use of resources and restoration of nature.

## **F. Financial Impacts**

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There are no direct financial impacts on the Town as a result of this specific Staff Report. However, policy and/or legislative changes from the Province may have undetermined impacts on resources and projects in the future.

## **G. In Consultation With**

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Trevor Houghton, Manager of Community Planning

Shawn Postma, Senior Policy Planner

## **H. Public Engagement**

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The topic of this Staff Report has not been the subject of a Public Meeting and/or a Public Information Centre as neither a Public Meeting nor a Public Information Centre are required. However, any comments regarding this report should be submitted to Nathan Westendorp, [directorplanningdevelopment@thebluemountains.ca](mailto:directorplanningdevelopment@thebluemountains.ca)

## **I. Attached**

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1. Attachment 1 (V– [Provincial Task Force Overview](#))
2. Attachment 2 – [Ontario Housing Affordability Task Force Report](#)
3. Attachment 3 – Town Comment Letter to Province

Respectfully submitted,

Nathan Westendorp, RPP MCIP  
Director of Planning and Development Services

For more information, please contact:  
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519-599-3131 extension 246