January 31, 2019

Ken Petersen, Manager
Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
College Park, 777 Bay Street, 13th Floor
Toronto, Ontario M5G 2E5

Dear Mr. Petersen:

RE: Consultation: *Increasing Housing Supply in Ontario* – Ontario Housing Supply Action Plan

Thank you for this opportunity to comment on the consultation document, *Increasing Housing Supply in Ontario*.

The Town of Caledon works closely with the Regional Municipality of Peel regarding housing planning matters. The Region of Peel is the Housing Service Manager with respect to supportive housing and homelessness and the Town fully supports the Region’s efforts in these critical housing areas.

We support the comments provided by Region of Peel staff in their submission (attached). The Town would like to add the following additional comments for consideration:

- The focus of the consultation document is about increasing housing supply in Ontario, in general – we believe that this premise needs to be scoped to reflect the key target areas that are under-represented in the existing housing supply market. In our community, there is a substantial supply of single family detached ownership housing. What we do need is an approach to encourage the creation of affordable units allocated for rental, young adults, seniors and persons with developmental disabilities. Specifically, for Caledon, we require suitable rental and senior housing – the supply of each which is critically low and causing citizens to move outside of the community.

- To encourage the development industry to build the type of senior housing the residents require, we are asking the Province to work with the Ministry of Health to create nursing care units (e.g. long-term care beds) in Caledon. Creation of nursing care units will serve as the catalyst for senior housing providers such as to build other forms of senior housing (assisted care and independent living units).

- Mandatory Inclusionary Zoning may not be appropriate for all municipalities as there is a financial burden associated with its implementation; if the Province imposes mandatory inclusionary zoning, the requirement of compensating the developer for the provision of affordable housing by the municipality needs to be reconsidered. Should this policy become mandatory, then financial compensation would need to be reconsidered.

- Consideration to impose a policy which prevents an owner to sell a new unit within a certain period of time without incurring a penalty (i.e. should the owner sell within the 2 years, the proceeds would be subject to capital gains), thus reducing flipping of properties and the escalation of pricing.
In addition, we also have provided some additional responses to the specific themes found in the consultation document:

1.0 Speed

- It is recommended that the Province provide an approval framework for agencies involved in the consultation process (provincial agencies, conservation authorities and school boards) to reduce the number of planning resubmissions and associated turnaround times. This framework could scope which documents need to be provided in the resubmission.

- The Province should consider providing incentives to private-public partnership projects.

2.0 Mix

- The Town supports intensification and infill of its existing settlement boundaries to fully utilized existing infrastructure. For Caledon, the provision of transit is crucial to meaningful intensification. For example, in the rural settlement area of Bolton, Highway 50, which is a north-south corridor, contains diverse land uses. One section of Highway 50 contains low rise strip plazas that would be ideal for future mixed-use development, with higher densities. To accommodate increased density levels, particularly if the units are affordable, then viable transit system is needed within the Town and to provide linkages to the rest of the GTA.

- The Province is encouraged to integrate legislation (Municipal Act, Planning Act, Heritage Act, Assessment Act, etc.) to allow for flexible land uses and housing models.

3.0 Cost

- Reduction and/or elimination of Development Charges should be targeted to housing types and housing tenure that are in need. The Province should provide clarification in the Development Charges Act when reduction/elimination of Development Charges can be applied. The Town could consider support of this concept in cases where there might be private-public partnerships in the provision of affordable housing, seniors housing and housing for persons with disabilities.

- The reduction/elimination of Development Charges should not be permitted for greenfield development where the development fees pay for needed infrastructure.

- It is recommended that the Province provide the standardization of the collection of monitoring data from specific municipal departments, for example, providing a standard approach to the building department for monitoring second units.

4.0 Rent

- It is recommended that the Province review the Residential Tenancy Act to explore landlord-tenant issues to provide a balanced approach to protection rather than a one-sided or unfair system.
5.0 Innovation

- It is recommended that new sources of funding be made available to municipalities to create incentives for the building industry to create partnerships and to provide units in targeted housing need sectors.

- The Province should develop a policy framework which flows from the National Housing Strategy. This would also involve working closely with CMHC in areas of research and demonstration projects, highlighting innovation and new housing models.

- It is also recommended that the Ontario Building Code be enhanced to include requirements for universal design features inside residential units as well as provide regulations permitting Flex housing.

- As mentioned above, the Province is encouraged to integrate existing legislation to allow for innovation.

- The Province should work with existing housing research "think tanks" to research and pilot best practices for affordable housing.

We look forward to the Ontario Housing Action Plan. We appreciate the continued consultation and opportunities to participate. Staff would be pleased to discuss any clarification of what is presented in this letter. Our staff contact is Marisa Williams, Team Lead Official Plan Review/Senior Policy Planner, Policy & Sustainability, Community Services 905-584-2272 ext. 4264, marisa.williams@caledon.ca.

Sincerely,

[Signature]

Sylvia Kirkwood
Manager, Policy and Sustainability
Community Services
TOWN OF CALEDON
Enclosure: Region of Peel letter

c. Adrian Smith, Region of Peel
   David Waters, City of Brampton
   Paulina Mikicich, City of Mississauga
   Peggy Tollett, Town of Caledon
   Mayor and Members of Council Town of Caledon