

Attachment C – Public Comments and Staff Response

Received from S. Maynard:

Dear Ms. Knight:

I am writing to comment on Baker's Quarry – 09-T-20001 Lots 7 to 16, Malloch Section, Plan 6262 Almonte Ward, Municipality of Mississippi Mills.

The proposed subdivision can't be approved due to non-compliance of the Community Official Plan with the Provincial Policy Statement, 2020 rendering the subdivision in non-compliance with the PPS, 2020.

Section 3(5) of the Planning Reads

"A decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Tribunal, in respect of the exercise of any authority that affects a planning matter,

(a) shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision; and

(b) shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be."

Section 1.4.3 of the Provincial Policy Statement, 2020 reads

"Planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:

(a) establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities"

There is currently no section in the COP on Affordable Housing that the subdivision can comply with so it must be rejected by Council.

Staff Response:

It is the Department's opinion that the above noted policy is indeed a target for affordable housing as required by the 2020 Provincial Policy Statement. In addition, the Department completed the three-year review of affordable housing for 2017 to 2019. The Department will be completing the next three-year review (2020 to 2022) this year and will provide a report to Council before the end of 2023.

With respect to this particular development, the proposal does not include affordable housing; however, staff note that the Official Plan policy is a target of which not to be

applied as a requirement for each development application. In addition, with the upcoming County Affordable Housing Grant Program, new developments, including this proposed development, will be able to apply for the grant program. With the recent efforts of Council over the past year and a half providing exemptions for cash-in-lieu of parkland, planning fees and building permit fees as well as the recent exemptions of Development Charges for affordable housing out of Bill 23, staff are optimistic that there will be future development of affordable housing in the Municipality. In addition, staff will be undertaking an Official Plan Amendment and Zoning By-law Amendment process to implement many of the changes stemming from Bill 23 which will also include updating the policies of the Official Plan with respect to affordable housing.

Received from T. Julian:

To Melanie Knight/Senior Planner and Council Members.

Thank you for proceeding with the public meeting to allow residents to voice their feedback for application 09-T-20001/Baker's Quarry.

My 2 concerns are as follows:

*1)I'm finding it hard to ascertain whether this application is compliant with our Community Official Plan. Specifically, in regards to the Affordable Housing policy *3.6.3 number 7. (Included below) This section states that our Municipality shall attempt to have 25 percent all new residential construction be **Affordable. The definition of Affordable from the Provincial Policy Statement is also included below. There has been no quantifiable data provided which would show whether this development will attempt to comply with our 25 percent target goal in our Affordable Housing policy. Also, there is no price point as to how much these homes will be selling for and no price point provided as to what is deemed "Affordable" in our regional market area.*

2)This development was originally going to include Medium density units but now has asked to be all Low Density units or Single family homes. Please explain how this will help attempt to have 25 percent of all new construction be Affordable. My understanding is that the lower the density is in a development the less Affordable it is.

Thank you in advance for any discussion or explanation you can provide on these issues.

Community Official Plan Affordable Housing Policy

3.6.3 Affordable Housing *Council will provide for affordable housing by enabling a full range of housing types and densities to meet projected demographic and market requirements of current and future residents of the municipality by:*

1. Monitoring the need for social assisted housing for households and seniors through periodic surveys in co-operation with area municipalities. Where specific needs are identified, Council will work with the Ministry of Municipal Affairs and Housing and the Social Services Department of the County of Lanark to meet identified needs.

2. Encouraging infill and housing intensification particularly in urban core areas. This may be achieved through the conversion of single detached dwellings to multiple units, through redevelopment at higher densities, through land severances on large under-utilized lots which create opportunities for development on the severed lot (subject to the relevant policies elsewhere in this plan) and through infill on vacant lands.
3. Ensuring a minimum 10-year supply of residential land at all times.
4. Working with the development industry to ensure that a 3-year minimum supply of registered or draft approved lots and blocks for new residential development is available at all times.
5. Monitoring population projections and the residential development targets discussed in this Plan.
6. Encouraging cost-effective development standards and densities for new residential development to reduce the cost of housing. The Municipality shall encourage an adequate supply of affordable housing.
- *7. The Municipality shall attempt to have 25% of all new residential construction affordable. In a given year the residential development may meet, exceed or fall short of the 25% target and therefore, to achieve a more realistic picture of the progress made in achieving this target, three-year averages shall be used to meet affordable housing objectives.*
8. The Municipality shall ensure that the Zoning By-law does not require standards which preclude the development of affordable housing, especially as it relates to house and lot sizes.
9. The Municipality may use incentives, such as reduced development charges or the increased height

Provincial Policy Statement Definition of Affordable

***Affordable: means*

a) in the case of ownership housing, the least expensive of:

- 1. housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for low and moderate income households; or*
- 2. housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area;*

b) in the case of rental housing, the least expensive of:

- 1. a unit for which the rent does not exceed 30 percent of gross annual household income for low and moderate income households; or*

2. a unit for which the rent is at or below the average market rent of a unit in the regional market area.

Low and moderate income households: means

a) in the case of ownership housing, households with incomes in the lowest 60 percent of the income distribution for the regional market area;

b) in the case of rental housing, households with incomes in the lowest 60 percent of the income distribution for renter households for the regional market area.

Staff Response:

With respect to the Community Official Plan policies for affordable housing, the 25% target in our Official Plan is a target, not a mandatory requirement for each and every new development. There are a few reasons for this, the first being is that affordable units (in planning terms) is a regulated definition through the Provincial Policy Statement (PPS) and in order to ensure that units are affordable when they are built and remain affordable, there must be legal mechanisms so that units are sold or rented at rates that reflect the definition of 'affordable'. At this time, this would be an agreement with the Lanark County. We are currently working with Lanark County to create a joint affordable housing grant program whereby property owners are not only incentivized through a grant program, but the Municipality will also have the framework in place (with the County) to ensure that any affordable units remain affordable for decades to come through agreements with the County.

The second reason that our 25% target is not implemented in each and every development is that, depending on the scale of the development, the developer may not have the capacity to provide affordable housing units (by way of legal agreements) in every development. New residential units include not only subdivision applications but also applies to smaller infill projects (for example the demolition of a single detached dwelling replaced by a semi-detached dwelling) and consent applications. The policy is also intended to recognize the fluctuation with development and that there are those different types of smaller scale development that may be very difficult to meet that 25% target.

There may also be years where there is little new residential construction overall. By having the target at 25% with the caveat built into the policy that "In a given year the residential development may meet, exceed or fall short of the 25% target and therefore, to achieve a more realistic picture of the progress made in achieving this target, three-year averages shall be used to meet affordable housing objectives." allows the Municipality to monitor and report on affordable housing using three-year averages rather than on an annual basis.

With respect to the observation about density and affordability- in many cases the denser a development is, the more affordable it may be; however, unless a developer is bound by an agreement with the government (municipal, provincial or federal) to ensure

that the rent/sale price of a unit meets the definition of affordable, the sale/rent of the unit is subject to market forces and there is no control over the cost of the unit for a future resident.

The Planning Department will be working on establishing a formal process with the County through our affordable housing grant program and we will also be moving forward with an Official Plan study to address the changes to the Planning Act from Bill 23 as well as the Official Plan study regarding a minimum percentage of secondary dwelling units in the recently expanded areas of Almonte that will all hopefully help to achieve the 25% target that is in the Official Plan.