



April 27, 2022
Ministry of Municipal Affairs and Housing
Via: planningconsultation@ontario.ca

Re: Conservation Ontario's Comments on "Opportunities to increase missing middle housing and gentle density, including supports for multigenerational housing" (ERO #019-5286)

To whom it may concern:

Thank you for the opportunity to provide comments on the "Opportunities to increase missing middle housing and gentle density, including support for multigenerational housing". Conservation Ontario is the network of Ontario's 36 conservation authorities (CAs). These comments are not intended to limit consideration of comments submitted individually by CAs through this consultation.

Having appropriate land use planning safeguards in place is essential for the overall health of Ontario and Ontarians. This includes having access to safe drinking water, directing development outside of hazard areas and having access to high quality greenspace, including conservation areas. An integrated watershed management approach can protect public health and safety while facilitating quicker development approvals and more housing supply in Ontario. Conservation Ontario looks forward to partnering with the province as they seek to increase missing middle house and gentle density.

We understand that the province is undertaking this consultation as part of its larger consultation on the implementation of Bill 109: *More Homes for Everyone*. We agree that infill and intensification, where growth is directed appropriately, provides an opportunity to accommodate growth while making efficient use of existing infrastructure and services. Conservation Ontario offers the following responses below to the discussion questions provided through this consultation. It is understood that any specific policy proposals to address housing matters would be consulted on prior to the government making any additional changes.

Discussion Questions

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

- A significant barrier is identifying where additional density would be appropriate in an existing neighbourhood of competing interests and various constraints, such as natural hazards. The province is encouraged to work with municipalities and CAs to identify where intensification may be appropriate in order to pre-zone these areas for intensification. Conservation authorities could help to identify appropriate development locations outside of natural hazard areas,

including flooding and erosion hazards and which conform to the significant threat policies and designated Great Lakes policies found within source protection plans made under the *Clean Water Act*.

- To help facilitate pre-identifying these areas, provincial staff should be made available for pre-consultation meetings where provincial-level approvals will be required.

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 province could consider further delegation of some provincial approvals, such as Environmental Compliance Approvals associated with stormwater, (with appropriate financial and technical support) to local agencies, including conservation authorities, that may be more familiar with flooding and/or servicing issues in existing neighbourhoods and able to find solutions to make it easier to support this type of development.
- The province could convene working groups to share best management practices to support streamlining the housing development process. For example, Conservation Ontario will be participating in preliminary pilot project regarding e-permitting opportunities in Simcoe County.
- Work collaboratively with municipalities and CAs to identify areas that are subject to new, rapid growth. These areas should be targeted for provincial investment in watershed-scale (or subwatershed) studies to delineate where and how missing middle development can occur.

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?

- Through Conservation Ontario's Client Service and Streamlining Initiative, one of the primary ways to streamline development approvals identified is to invest in high quality pre-consultation activities. The province could provide additional supports (e.g., guidelines) to the planning approval authorities to engage in comprehensive pre-consultation with applicants and approval agencies to contribute to faster approval times for missing middle housing.
- Sharing of best practices for pre-consultation, such as CAs' use of design charrettes, could make them more widely adopted and encourage a partnership approach to the development approval process. Emphasize quality pre-consultation and quality submissions through updated provincial, municipal and CA guidelines.
- Invest in e-permitting solutions, such as the Grand River Conservation Authority's online permit application process to enable other CAs to deploy similar systems. Through provincial leadership in data exchange standards (referenced previously) these CA systems could be integrated into municipal and provincial systems.
- Opportunities to increase missing middle housing will require collaboration among the sectors involved in the building, development, and approval process. We encourage the provincial government to consult with involved parties to investigate and find innovative solutions to increase housing affordability, including through missing middle, gentle density and multi-generational homes. All sectors will have to work together to address this housing crisis. For example, bringing municipalities, CAs, the development industry and the province together through regional planning forums allows local success stories to be shared and best practice networking to occur. These forums can be utilized to make our planning system more innovative and resilient

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

- Conservation authorities are establishing a renewed relationship with municipalities as well as the province. The province can continue to support municipalities and CAs as they move through the transition period resulting from recent changes to the *Conservation Authorities Act* and associated regulations. This renewed relationship will help to streamline the housing development process overall and the increase in missing middle housing specifically.
- Update and harmonize the provincial Natural Hazard Technical Guides which support the modernization of the provincial land-use planning and CA regulatory processes.
- Continue the work of the Provincial Floodplain Mapping Technical Team lead by NDMNRF. Implementation of a provincial framework for floodplain mapping would provide clarity on areas where intensification could occur and where it should not occur due to lack of safe access or the presence of flooding hazards.
- We support the provincial work to create a unified data exchange framework. Conservation Ontario is a member of the One Ontario coalition which is working on this approach. Provincial leadership and investment are required for the design and implementation of a successful provincial e-permitting scheme.
- Update the 1993 provincial Watershed Planning Guidelines and finalize the recent draft Subwatershed Planning Guide (2022) based on Environmental Registry of Ontario feedback (ERO# 019-4978). Updated guidelines for subwatershed studies would assist municipalities, CAs, the development community and other agencies to define clear roles and responsibilities, streamline technical study requirements, compress timelines and facilitate approvals for new development.

Once again, thank you for the opportunity to provide comments on the “Opportunities to increase missing middle housing and gentle density, including support for multigenerational housing”. Conservation Ontario looks forward to being engaged by the province as they move forward with their housing supply action plans. Should you have any questions about this response, please contact me at extension 226.

Sincerely,



Leslie Rich, MES RPP
Policy and Planning Specialist

c.c. all CA GMs/CAOs

Conservation Ontario
120 Bayview Parkway, Newmarket ON L3Y 3W3
Tel: 905.895.0716 Email: info@conservationontario.ca
www.conservationontario.ca