



What We Heard: Advisory Committees Consultations

City of Peterborough Official Plan Update

October 2021

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1.0 Introduction

This is a summary of questions and comments from the advisory committees of Council on the draft Official Plan released in July 2021 and the City’s respective responses. City Planning Staff met with the Arenas, Parks and Recreation Advisory Committee, Peterborough Environmental Advisory Committee and Planning Advisory Committee at the meetings held on September 14th, 15th and 16th, 2021 respectively.

2.0 Arenas, Parks, and Recreation Advisory Committee

#	Comment/Question	City’s Response
1	With respect to climate change - this council declared climate emergency. Through the document, as we continue to go through public consultation - will there be more prominent changes?	The Official Plan is a high-level policy document. While there are specific climate change policies in the document, it is also important to acknowledge that several policy directions like intensification, promoting active transportation and protecting the natural heritage system seek to make Peterborough a greener city without specifically mentioning the phrase ‘climate change’.

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#	Comment/Question	City's Response
2	Affordable housing from 10 to 20 percent. We can't mandate developers on Rent Geared to Income (RGI) housing. Do we have a vehicle to mandate it?	The definition of affordable housing for the purposes of the Official Plan is the definition from the Provincial Policy Statement. The Planning Act does not enable the City with the tools to mandate affordable housing through inclusionary zoning. In addition to the proposed policies, there are enabling policies for additional residential dwelling units, mix of housing types, and the opportunity to provide financial incentives where appropriate.
3	What is the difference between lodging housing vs secondary suites?	<p>A secondary suite is a self-contained residential unit with a private kitchen, bathroom facility and sleeping area and living area within a dwelling or within a structure that is accessory to a dwelling with access gained either through a separate entrance or common area.</p> <p>A Small Lodging House (SLH) is a type of dwelling unit that contains between 5 and 10 bedrooms and does not function as a single house-keeping unit. An owner of an SLH will need to prove zoning compliance to obtain a business licence and the SLH must pass an inspection in accordance with the City's Rental Dwelling Unit Licensing By-law. A large lodging house has between 11-30 bedrooms.</p>

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#	Comment/Question	City's Response
4	Where can we find the priority parks for rejuvenation? Ten (10) neighbourhood parks were identified in the Municipal Open Space and Parks Study.	The Municipal Parks and Open Space Study was completed to identify gaps in access to neighbourhood parkland, provide strategies to address the gaps and evaluate city-owned open space to recommend sites to be considered for parkland. Upgrades to existing park facilities will be considered through the capital budget process undertaken by Council each year.
5	What happens to Parks that seek a heritage designation? i.e. the Courthouse Park.	Policies enabling the study of heritage resources are included in Section 5.1 (Cultural Heritage) of the Official Plan. Identifying priorities will be done through the Heritage Preservation Office in consultation with the Peterborough Architectural Conservation Advisory Committee, property owners and residents. If Council approves a heritage designation for a park, any development or action that would impact the property would need to be supported by a Heritage Impact Assessment and approved by Council.
6	What are the benefits of A Place to Grow: Growth Plan for the Greater Golden Horseshoe policy?	Some of the benefits of GGH policy are: <ul style="list-style-type: none"> • Centralized directive curb sprawl; • Supporting the creation of complete communities; • Managing growth to optimize infrastructure; and, • Supporting economic development.

3.0 Peterborough Environmental Advisory Committee

#	Comment/Question	City's Response
1	The final draft is an impressive document that is well balanced and holistic in addressing competing land use priorities.	Thank you. Noted.
2	The language should be strengthened (i.e. "encourage" and "consider" to "shall" or "will" statements). PEAC believes the Official Plan is a better document where it is specific and more prescriptive.	Every sentence in the draft Official Plan has been reviewed in terms of the strength of the language. Municipalities are given authority in provincial legislation to compel on certain policy statements, but not all statements. It has been the approach of this draft Plan to use the strongest language where it has the authority to do so, and to soften the language (e.g., consider/encourage/may) where no full authority is provided to require or impose an outcome.
3	Radical changes need to be made in the early years of the Official Plan if we plan to reach a decarbonized future by 2051	Some policies within the Official Plan have immediate effects, other policies are more long-term. The Official Plan includes a number of policies which address the reduction of carbon including, but not limited to, promoting intensification and high-density mixed-use development along arterial roads, supporting active transportation and transit usage, and supporting the creation of complete communities by permitting neighbourhood-supportive uses in the Residential designation.

#	Comment/Question	City's Response
4	<p>Climate change must appear early in the document and be a key feature of the Official Plan emphasizing:</p> <ol style="list-style-type: none"> 1. The urgency of the climate crisis with an affirmation of the city's commitment to action upheld by the land use policies enshrined in this Official Plan 2. Recognition that Climate Change is one of the most important factors influencing the health, safety, and future prosperity of our community 3. Highlight the influence that climate change will have on planning and infrastructure looking outward to the end of the plan in 2051 4. State the targets and dates from city council's 2019 Climate Change Emergency Declaration, and highlight that our first greenhouse gas emissions milestone is in 2030, which is only 9 years away from this new Official Plan. 	<p>Additional policy language was added to give greater prominence to responding to climate change, more specifically, Section 1.1 – Context, vision statement in Section 2.1, and Section 2.2 – Guiding Principles. It is also important to acknowledge that several policy directions like intensification, promoting active transportation and protecting the natural heritage system also supports objectives related to climate change. Section 5.7 also acknowledges the need to adopt climate change mitigation and adaption measures to enhance the resiliency of its built and natural environments.</p> <p>The City's climate change targets have already been endorsed/adopted by Council and it is not necessary to duplicate the targets into the Official Plan. Therefore, it is on the public record that those targets are the City's objectives – there is not any added benefit of adding that same language to the Official Plan.</p>

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#	Comment/Question	City's Response
5	<p>The Official Plan needs to address the changes that are coming in terms of alternative fuel sources, modes of transportation, green infrastructure and low impact development.</p>	<p>The draft Official Plan sets the framework around various modes of transportation, green infrastructure and low impact development.</p> <p>The incorporation of sustainability features, including green infrastructure, green building practices, energy conservation measures and renewable/alternative energy systems is a development criteria that shall be used when reviewing every development application or intensification in the residential designation (see Section 4.2.2 c). The City is also committed to creating a Stormwater Management Plan that incorporates appropriate low impact development and green infrastructure (Section 6.1.5 h)</p>
6	<p>PEAC believes that the Official Plan should address how the goals of the plan are monitored and evaluated.</p>	<p>The Official Plan establishes a framework and includes policies that enable on-going monitoring of the effectiveness of this Plan as well its commitments (Section 7.3.3 a). The Plan will need to be reviewed, at a minimum, within 10 years of coming into effect and at least every 5 years thereafter until it is replaced with another new official plan. It is envisioned that an implementation strategy will be established to guide priorities, work schedule, and initiatives, including monitoring.</p>

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#	Comment/Question	City's Response
7	<p>Although the plan does include many elements to encourage active transportation and public transit, it seems to be based on the premise of automobile supremacy. Parking is mentioned 130 times, bicycle parking only 13. Vehicular access is still prioritized over transit and active transportation.</p>	<p>The Plan states that development shall include context appropriate on-site vehicular and bicycle parking, as required in the Zoning By-Law (Section 6.2.7 Parking).</p> <p>Detailed requirements for both vehicle parking and bicycle parking spaces for new development will be established in the Zoning By-law. A new Zoning By-law is required to be approved by the City within three years of adopting a new Official Plan.</p>
8	<p>The plan does not fully acknowledge the massive change in fuel source that will occur between now and 2051. Electric vehicle charging stations are mentioned only once in the plan. Gas bars are specifically allowed in 4.5.3 e) General Employment Designation though they should be limited to two at an intersection.</p>	<p>This Plan sets out a framework through Section 6.2.6 (Road Network) where locations of electric vehicle charging stations would be considered through a more detailed Master Plan such as the Transportation Master Plan. The Plan also requires that new development consider the needs of emerging transportation needs including, but not limited to electric vehicle charging stations.</p>

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#	Comment/Question	City's Response
9	<p>Section 5.7 on Climate Change contains weak language (5.7 b) – The City should “consider” developing strategies to reduce GHG emissions and improve resiliency, etc.</p>	<p>Every sentence in the draft Official Plan has been reviewed in terms of the strength of the language. Municipalities are given authority in provincial legislation to compel on certain policy statements, but not all statements. It has been the approach of this draft Plan to use the strongest language where it has the authority to do so, and to soften the language (e.g., consider/encourage/may) where no full authority is provided to require or impose an outcome, although said outcome is desired.</p>
10	<p>Few details on climate adaptation. Section 4.1.3 j) on Hazard Lands states “When reviewing an application for development, or other applicable process, the City shall consider the potential impacts of climate change that may increase the risk associated with natural hazards.” This seems like it needs more direction on how exactly this will be done.</p>	<p>Policies regarding hazard lands have been revised in consultation with the Otonabee Region Conservation Authority (ORCA). The policy is also consistent with Section 3.1.3 of the Provincial Policy Statement where “planning authorities shall consider the impacts of climate change that may increase the risk associated with natural hazards.” The Ministry of Natural Resources and Forestry also provides technical guidance material on natural hazards.</p>

#	Comment/Question	City's Response
11	<p>The plan directs with varying strength of language the creation of a range of policies, plans and programs. Section 7.3.3 on Monitoring says only: "Monitoring and measuring performance will be conducted through both available qualitative and quantitative measures. The results from monitoring activities may be used to inform future policy direction and updates to this Plan." How and how frequently will monitoring be conducted? Here are a list of the plans, programs and policies I identified (not complete), along with the type of language used (will, shall, should consider etc):</p> <ul style="list-style-type: none"> • Complete Streets Guide (will 6.2.4 e vii) • Sidewalk strategic plan (shall 6.2.3 i) • Economic development strategy which may include consideration of Smart City Strategies(will 7.3.4 Planning studies) • Stormwater plan (will develop 6.1.5 h) • Community Benefits Charge Study (will 7.14) • Development Charge background study (will 7.15) • Urban design guidelines for mid-rise and high rise development (may prepare 5.4.1 h) • policies and procedures for the implementation of a successful public art program (sill adopt 5.4.3 c) 	See response to comments #6 and #9 of this table.

#	Comment/Question	City's Response
	<ul style="list-style-type: none"> • Sustainable Neighbourhood Action Plans (consider – 5.7 b) • climate change policies to apply to capital works projects (consider- 5.7 b) • strategies to reduce ghg emissions and improve resiliency (consider – 5.7 b) • GHG inventories and forecasts (consider- 5.7 b) • Monitoring and reviewing GHG emission reduction targets (consider 5.7b) • 5.7 d) contains a large number of initiatives and programs for the City to “encourage and provide policy direction on”, including water conservation, energy conservation, air quality protection, integrated waste management, energy efficiency, alternative energy strategies, district energy generation, renewable energy systems, distribution and demand management plans, land use and urban design standards to support energy conservation, promotion of innovative residential and public building designs that contribute to low carbon designs, green infrastructure and low impact development. • Community Energy Plan and/or Green Development Standards (may consider the development 5.7 e) • Watershed Plan and Implementation Plan (will prepare 6.1.4 b) 	

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	<ul style="list-style-type: none"> • Municipal active transportation plan, either independently or as part of a Transportation Master Plan (should develop 6.2.3) • urban street tree planting program (6.2.3 I) 	
12	<p>5.5 (a) How is woodland cover and tree canopy cover measured? is this as a percentage of total municipal lands within the borders? If so, has the 700+ acres for the Trent Severn and Otonabee systems been incorporated? If these things haven't been incorporated (where trees other than mangroves simply cannot grow) then the metric being used is flawed. Also, why the specific reference to "woodland cover" here (as this is covered by the Woodland Tree By Law rather than the Urban Forest By Law) and this is the only reference to "woodland" (defined as over 1ha in size) within this section of the Plan draft?</p>	<p>The percentages are measured over the total area within the city's boundary. Woodland cover is referenced in this section because it is a component of the City's overall tree canopy cover.</p>

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#	Comment/Question	City's Response
13	<p>5.5 (b) Again, the mechanisms to measure this within the Urban Forest Strategic Plan have been highlighted, such as the over-reliance on canopy cover measurements above most all else. I.e: species, canopy position, overall form and function, etc. Be careful not to miss the urban forest for the trees. If renewal is already occurring, or if the canopy is of undesirable and infrastructure damage-prone trees, isn't removal a benefit to the City?</p>	<p>Comment is noted.</p>
14	<p>The policy language in Section 5.5(c) regarding the tree canopy target is very awkward. Should be strengthened for an official plan especially where words like "shall" are involved.</p>	<p>This policy has been rephrased to improve clarity – “In addition, the City shall achieve an overall tree canopy cover of 35 per cent by 2051 or an alternate target as prescribed by the Urban Forest Strategic Plan, whichever is greater.”</p>
15	<p>5.5 (c) (ii) “Require the planting of trees in all City infrastructure-related works”</p> <p>This is a very general statement that, while it sounds good, does not mesh well with infrastructure "all" of the time. I highly recommend it be changed to "wherever practical, pragmatic, and feasible"</p>	<p>Added clarification to indicate “on-site or in proximity to the site, where feasible” to this policy.</p>

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#	Comment/Question	City's Response
16	<p>5.5 (d) "All trees shall be of a species native to this region and that would provide a large canopy and shade over sidewalks, parks, open spaces and other publicly accessible areas"</p> <p>Again, this sounds great, but is contradictory. There are many species that are not native to this region that are much more climate adaptable than the options we currently have. This is *literally* what assisted migration under climate change speaks to, and these species are not considered "native" to this area. This has been widely discussed in the literature and described in great detail. I feel that there is a potential contradiction in the direction supplied here, especially over the planning term of the Plan, in regards to Climate Change.</p>	<p>Revised this policy to state that trees shall be of a species adapted to this region and provide preference for native species.</p>

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#	Comment/Question	City's Response
17	<p>5.5 (e) To preserve and protect Peterborough's urban forest, the City will promote public and private initiatives to increase the planting of trees within the City so that there will be no net loss of tree canopy</p> <p>Over what temporal scale? If measured too closely, every time that a tree is cut, there is a net loss. Again, specifics. These statements sound great, but for those of us who deal with these things these words can become highly problematic in the everyday work of trying to meet the goals and objectives as stated here.</p>	<p>This policy has been revised to clarify that the intent is to increase overall tree canopy cover over time.</p>

#	Comment/Question	City's Response
18	<p>5.5 (f) Why trees that *must* be removed? I can think of many abandoned lots where there is 100% tree cover currently and the city has provided the support for infill development. If there is language here saying "require the replacement of trees that must be removed" (and the next item describes that they be replaced on the same site or provide cash in lieu), then there is a significant disincentive to pursuing abandoned site development within city limits. Right? Again, this sounds nice but doesn't provide much room for pragmatic approaches such as offsetting.</p> <p>Also, what about trees that are a huge issue for infrastructure to either the landowner or the City? Trees *do naturally regenerate and we have seen how little the City projections recognize this. I see a major issue with people seeing trees in the light of a liability rather than a green infrastructure benefit and killing them before they reach the size deemed to be a "tree" by the city (and I hope City staff does as well). This is generally called a "perverse incentive" and is a classic policy-development pitfall.</p>	<p>Comment is noted.</p>

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#	Comment/Question	City's Response
19	<p>5.5 (g) This is highly prescriptive and does not recognize the ability to provide alternative approaches to meet the objectives of the Tree By Laws, such as planting on other sites under the same ownership or through an agreement with another landowner, which would still accomplish the same objectives. I feel this is far too narrowly focused and does not meet the test of good policy development in forestry.</p>	<p>Comment is noted. No changes are recommended.</p>
20	<p>5.5 (i) "Where trees are removed as a result of municipal development or infrastructure works, trees will be replaced in accordance with the City's tree by-laws. If it is not feasible to replant trees in the same location, the City will replant trees on other available municipally owned land or private land with consent of the owner."</p> <p>By my reading thus far, the City can do this but the landowner cannot. Is that incorrect?</p>	<p>This statement is correct.</p>

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#	Comment/Question	City's Response
21	<p>5.5 (j) "The City will require the submission of a Tree Inventory and Protection Plan as a condition of a development application. The Tree Inventory and Protection Plan will identify the trees proposed to be removed, their condition, justify the need for their removal, specify a replacement/replanting program, and identify mitigative measures to protect remaining trees."</p> <p>Again, very absolute language here which is a big pitfall in policy development. What about those areas where the City or a landowner wants to do something where other primary goals of the Official Plan or Climate Change Emergency Declaration can be realized? The way these statements read is "will" which provides for very little nuance and pragmatic approaches that meet objectives. Take the example of an abandoned lot covered with buckhorn and poplars (very common). The landowner wishes to turn this into a public composting and waste diversion project. They only own one acre. Under this Plan and the way that it reads, this likely will not be able to occur because of the trees, despite the overwhelming benefit of the project as the landowner cannot replace those trees on this small property.</p>	<p>Comment is noted.</p>

#	Comment/Question	City's Response
22	<p>Although there is no order of priority implied in the order of the policies, place climate change as the first section as climate change adaptation will be critical.</p>	<p>No change recommended. The Plan is not intended to be read as individual, stand-alone Sections addressing specific topics, but rather must be read as a whole to support successful city-building. For any individual part to be properly understood, this Plan must be read as a whole and there is no implied priority in the order in which policies appear in the document.</p>
23	<p>Climate change, population growth and density, and the economy will be three of the major drivers of a future Peterborough. The United Nations' Intergovernmental Panel on Climate Change report released in the summer of 2021 is unambiguous that climate change is a 'code red for humanity'. All levels of governments, communities and citizens must take action to reduce greenhouse gas emissions (mitigation), and just as importantly, prepare for the change that climate will bring (adaptation). There will be warmer temperatures, an increased likelihood of more frequent and intense weather events, and greater natural hazards risks for Peterborough. The City of Peterborough must take climate change mitigation and adaptation actions to reduce impacts to city lands, infrastructure, assets and services, and to ensure the well-being of its residents.</p>	<p>See response to comment #4 of this table.</p>

#	Comment/Question	City's Response
24	<p>On September 23, 2019, City Council declared a climate change emergency that recognized there is a need to achieve a target of 45 percent reduction in greenhouse gas emissions by 2030 and reach net zero emissions by 2050. The city will:</p> <ul style="list-style-type: none"> a. Achieve at least a 45 percent reduction in greenhouse gas emissions by 2030, and reach net zero emissions by 2050; b. Report annually to city council and the public, Peterborough greenhouse gas emission levels; c. Implement city actions identified in climate change mitigation and/or adaptation plans, policies, declarations, or strategies adopted by city council; d. Prepare and implement a multi-year city infrastructure, assets and services climate change adaption plan, including a risk assessment, priorities and cost estimates so that city decision makers and the public understand what is required to prepare for climate change impacts; e. Integrate climate change into municipal decision-making processes that inform the way Peterborough is planned, developed, used, rehabilitated and/or maintained. 	See response to comment #4 of this table.

#	Comment/Question	City's Response
25	<p>Recommendation to add the following policy:</p> <p>A commitment to maintaining and expanding parklands and greenspaces within the city limits is critical to the health and well-being of its residents and even more so in light of proposed increases in population size and density, and as a tool to mitigate and adapt to climate change. The city will:</p> <ul style="list-style-type: none"> a. Achieve a target of 4 ha per 1,000 residents of parklands by maintaining existing parks and developing new ones; b. Maintain at least 20 percent of its lands as greenspace (i.e., parks, trails, urban forests, natural heritage areas, floodplains); c. Plan and hold lands for regional or community parks in greenfield areas prior to allowing development. 	<p>The Parks Development Standards establishes the appropriate target of parkland in relation to the population. The draft Plan was developed to be consistent with the Municipal Parks and Open Space Study from February 2020, notably the park hierarchy, and planning and design standards. Section 7.12 outlines the requirements regarding parkland dedication in accordance with the Planning Act.</p>
26	<p>Recommendation to add the following policy: The city will allow community gardens (either vegetable or flower) on any designation of parkland in Peterborough, or in open spaces (with the exception of natural heritage areas) to provide food production spaces, contribute to the well-being of residents, foster a connection to the land, and add to the sense of neighbourhood.</p>	<p>Community gardens are listed as permitted uses in the Major Open Space (Section 4.2.4) and Downtown Open Space (Section 4.3.6) designations. Section 5.3.2 Provision of Parkland also states that the City will provide a public park system that provides opportunities for community gardens. The facilities provided at each park is established through the recommendations of the Strategic Plan for Recreation, Parks, Arenas and Culture/Park Development Standards.</p>

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#	Comment/Question	City's Response
27	<p>Recommendation to add the following policy: The city will examine the feasibility of designated brown field spaces, such as General Electric, becoming parklands.</p>	<p>The draft Official Plan contains language acknowledging key strategic development and investment areas and potential financial and planning tools, particularly the General Electric Lands. A policy was also added in both the Central Area and the Employment Lands Designation sections for the preparation of Urban Design Studies for lands with significant redevelopment potential.</p>
28	<p>Recommendation to add the following policy: To realize its target of 35 percent forest canopy by 2051, the city will implement an accelerated inventory and planting plan for trees on municipal lands during the first 10 years of this plan, and continue to systematically inventory, plan and plant trees in the remaining years.</p>	<p>Section 5.5(c) states that the City will implement the Restoration and Enhancement Strategy and street tree and naturalization programs to increase urban tree canopy cover. Specific details on how the City will work to achieve its target for tree canopy cover will be considered in the Urban Forest Strategic Plan and the Restoration and Enhancement Strategy.</p>
29	<p>Recommendation to add the following policy: The city will monitor and report on the state of its established natural heritage sites on a ten-year sampling cycle in order to measure the effectiveness of environmental stewardship, and the impacts of climate change on the natural heritage system.</p>	<p>No change recommended - It is generally advisable to avoid stating specific timelines for specific initiatives in the policies. Section 7.3.2 (Monitoring) indicates that the City will undertake performance measurement in a variety of ways including, but not limited to municipal performance measures reporting.</p>

4.0 Planning Advisory Committee

#	Comment/Question	City's Response
1	In the intent section for Central Area land use designation Public Service Facilities are not included. Why?	Public Service Facilities are permitted in all designations, except the Natural Areas designation.
2	Where are community development policies that are explicitly orientated towards arts and culture sector?	References to arts and culture are found throughout the Official Plan. A decentralized location was intentional because Arts and Culture fits into the many aspects and sections of the Official Plan.
3	Lodging houses and shelters are not specifically named in the Official Plan. Why?	Section 5.2.3 provides consideration for special needs housing, having to permit and facilitate all forms of housing. Group homes form part of this group as well. Policies for public service facilities are in Section 4.1.2.
4	Does the definition of special needs housing cover emergency and transition housing in the definition? If not, should be specified/added.	No changes recommended – the definition is consistent with the Provincial Policy Statement.
5	What are the process and timelines for Zoning By-law Amendment?	The Planning Act requires a new Zoning By-law to be approved by the City within three years of the new Official Plan taking effect.

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#	Comment/Question	City's Response
6	<p>What are some of the commitments as a result of the new Official Plan? And how will the community be involved?</p>	<p>A number of policy commitments are identified in the Plan, including but not limited to:</p> <ul style="list-style-type: none"> - Preparing secondary plans for Strategic Growth Areas; - Evaluating all of the wetlands within the City; - Undertaking a Restoration and Enhancement Strategy; - Increasing tree canopy cover to a minimum of 35% of the total land area; - Completing a Heritage Conservation District study for the Central Area; - Continuing to develop connected bikeways by implementing the trails and bikeways network shown in Schedule E as per the recommendations of the Transportation Master Plan; and, - Preparing an Employment Land Strategy and economic development strategy. <p>Several policy commitments outline the need to engage the public and stakeholders. It is envisioned that the commitments of the Official Plan will be reviewed as part of the annual budgetary process and may be supported with an implementation strategy to guide priorities, work schedule, and project scope including community engagement.</p>

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#	Comment/Question	City's Response
7	One of the challenges identified is the affordable housing. What is affordable?	<p>Affordable housing is a term that has multiple meanings to different stakeholders. In the case of the Official Plan, the definition of affordable comes from the Provincial Policy Statement.</p> <p>Most of the time, the reference to affordable housing we hear is in reference to forms of subsidized housing.</p> <p>Prior to Bill 108, the province provided a tool in a form of inclusionary zoning that would have allowed us to mandate the type of housing. However, with the latest revisions to the Planning Act, encourage/consider is the strongest language at our disposal today. In addition to the policies around affordable housing, we also have policies for allowing up to two additional residential units (i.e., secondary suites) to help mitigate affordable housing.</p>
8	Does the prediction of new housing starts and the affordable housing target correspond with the goal of providing the affordable housing in the Housing and Homelessness Plan?	<p>Definition of affordability in the Official Plan comes from the Provincial Policy Statement. Housing and Homelessness Plan has a different definition and therefore targets a different level of housing affordability. However, it is a policy of the Plan that the City will strive to achieve the targets for the provision of affordable housing identified in the Housing and Homelessness Plan, specifically affordable housing for low- and moderate-income households and for those requiring support services.</p>

