

Appendix B: Staff responses to submissions, delegations and discussions

Theme	Commenter(s)	Issue Identified	Staff Response	Change(s) to CIP / Recommended Approach/Actions
Definition of Affordability	WEHBA Carriagegate CLV	<p>Affordable definition is not usable. Too onerous.</p> <p>Suggest aligning with one specific CMHC program (Apartment Construction Loan Program) – rely on clearing CMHC hurdle - rather than expressly identifying an affordable definition in the CIP.</p> <p>Apartment Construction Loan Program: Standard Rental Housing CMHC</p>	<p>CIP definition aligns with DCA mandatory exemptions for affordable housing.</p> <p>Affordability has been defined in accordance with income-based thresholds for affordable monthly rents by unit in the “Affordable Residential Units for the Purposes of the Development Charges Act, 1997 Bulletin” (DCA, 1997 Bulletin), effective June 1, 2024.</p> <p>The financial analysis supporting the development of the CIP incentive maximum program values included this affordability definition in its assumptions. See Appendix B to DGM-24-25.</p>	No changes recommended.

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Affordability period is too long	WEHBA CLV Carriagegate	The default 25 years cited in the CIP is onerous and too long.	<p>The period to full loan forgiveness is set at 10 years under the ARU (in the draft version the ARU program was set at 5 years), Missing Middle Units, and Mid/High-Rise Units Affordable Rental Programs.</p> <p>The 25 year affordability is tied to DCA affordable housing DC exemption requirements that require agreements, monitoring and monitoring per the Regional and local approach set out in Region report FN-05-25 dated Feb. 19, 2025.</p>	<p>Changes recommended:</p> <p>Clarification added to Section 5.3</p>
Market rental	WEHBA Carriagegate CLV	Given conditions the CIP should be supporting market rental units as well.	<p>The City's CIP is focused on affordable rental housing in response to Council approved Housing Strategy for more diversity and increasing affordable and supportive housing.</p> <p>Opportunity through changes to the proposed DC deferral program to reduce the percentage of affordable units required to be eligible which may indirectly support the feasibility of the creation of market rental housing as well as the introduction of new affordable units.</p>	<p>Changes recommended:</p> <p>See Section 5.6 and Appendix B: Refined interest free DC deferral program, now only applicable to Rental Housing. Reduce percentage of units required to be affordable for eligibility from 30% to 10% and propose interest free on City</p>

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				portion of existing required DC rental housing deferral.
General Viability of Development	WEHBA	External forces making a difficult situation worse for affordable rental housing development feasibility.	The City's CIP is focused on affordable rental housing in response to Council approved Housing Strategy for more diversity and increasing affordable and supportive housing.	<p>No changes recommended.</p> <p>Action: Use CIP to demonstrate the City's commitment to the creation of more diverse housing options and seek to leverage other senior level of government programs and funding opportunities</p>
% affordable units required to qualify too onerous	WEHBA CLV	30% of units in a project being affordable is onerous (related to DC deferral program)	<p>Housing Strategy and HAF Action plan goals are to increase the percentage and number of affordable housing units for low-moderate-income households.</p> <p>Opportunity through changes to the proposed Affordable Rental Housing DC deferral program to reduce the percentage of affordable units required to be eligible</p>	<p>Changes recommended:</p> <p>See Section 5.6 and Appendix B:</p> <p>Refined interest free DC deferral program now only applicable to Rental Housing. Reduce percentage of units required to be affordable for eligibility from 30% to</p>

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				10% and propose interest free on existing required DC rental housing deferral.
DC deferrals should be interest free	Carriagegate WEHBA	Leaving in accrued interest defeats the purpose of a deferral	<p>City proposes changes to the CIP, allowing for interest free deferral payments.</p> <p>Note that a DC deferral program required by the DCA, 1997 is already in place for rental residential units, allowing for six annual installment payments, starting at occupancy.</p> <p>At this time, the Regional portion of the deferred payments would still be subject to interest. Future opportunities exist to work with the Region to identify future opportunities to support the City's CIP.</p> <p>Staff expect further information will be presented to Council in response to the following Staff Direction: "Direct the Chief Financial Officer to report back... on the potential implementation of interest-free deferral programs for qualifying individuals, companies or organizations impacted by American tariffs such as the following: property tax, development charges, and/or other city fees."</p>	<p>Changes recommended:</p> <p>See Section 5.6 and Appendix B:</p> <p>Refined interest free DC deferral program now only applicable to Rental Housing. Reduce percentage of units required to be affordable for eligibility from 30% to 10%, and propose interest free on the City portion of the existing required DC rental housing deferral.</p> <p>Action:</p> <p>Use CIP to leverage Regional partnership, interest-free DC payments.</p>

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Residential DCs should be eliminated for units under the CIP	Carriagegate	The Hamilton Roxborough CIP eliminated residential DCs for units within the site-specific CIP.	<p>The City's CIP is focused on affordable rental housing in response to Council approved Housing Strategy for more diversity and increasing affordable and supportive housing.</p> <p>The CIPA includes the entirety of the Urban Area. Broad exemptions to DCs beyond those mandated by the DCA are not feasible or appropriate.</p>	No changes recommended
Residential DCs should be eliminated everywhere in the Built-up Area	Carriagegate	"Necessary services and facilities that the DCs are intended to establish already exist"	<p>Staff do not agree.</p> <p>Development charges eligible projects are located across the City, including for infrastructure upgrades, integrated mobility, and buses for transit services among other things.</p>	No changes recommended
DCs should be reduced by 50% for ALL residential uses immediately	WEHBA CLV Carriagegate	Mississauga has taken steps to reduce development charges by 50% for all residential uses until the end of 2026.	<p>In Spring 2024, DC By-law was updated to provide reflect significant changes to Provincial legislation.</p> <p>Any further updates would require an amendment to the DC By-law. The City's DC By-law is currently under appeal.</p>	No changes recommended.
DC deferral of the reduced rate delayed to occupancy	WEHBA CLV Carriagegate	Opportunities for DC deferral for ownership units.	<p>Changes to the DC deferral program have been focused on rental housing.</p> <p>Staff expect further information will be presented to Council in response to the following Staff Direction:</p>	No changes recommended

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		<p>When does deferral start?</p> <p>Want 2 years after first occupancy permit.</p> <p>Looking for 2-5 years</p>	<p>“Direct the Chief Financial Officer to report back... on the potential implementation of interest-free deferral programs for qualifying individuals, companies or organizations impacted by American tariffs such as the following: property tax, development charges, and/or other city fees.”</p>	
Waive CBCs and Parkland	WEHBA	In addition to DCs, waive CBC and Parkland fees	<p>The Planning Act requires discounts for community benefits charges and reductions in parkland, for affordable residential units as defined in the DCA, 1997.</p> <p>The City’s Community Benefits Charges By-law is under appeal.</p>	No changes recommended
Region must participate	WEHBA	Regional DCs most impactful	<p>Agree Regional DCs are most impactful. Region is participating in establishing required DC exemptions per DCA.</p> <p>Region’s mandate for CIPs is over. However, the Region remains the Housing Service Provider and has a role in creating new assisted housing through its Comprehensive Housing Strategy.</p> <p>Region is open to discussing opportunities to deepen affordability to the Assisted</p>	<p>No changes recommended.</p> <p>Action:</p> <p>Use CIP to leverage Regional partnership, to pursue shared program opportunities, e.g. TIEG.</p>

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			Level, and to discuss regional tax portion of a tax increment grant program (TIEG)	
Stability of Funding	CLV	From clarity and predictability perspective they need more certainty about post HAF funding	<p>City staff committed to bringing a CIP budget business case to the 2026 budget.</p> <p>Staff agree that clarity and predictability of funding including multi-year budget commitment would be ideal, though may be challenging in practice.</p> <p>Staff will monitor for any new housing funding programs post Federal election that could further fund the CIP and complement a City budget request.</p>	<p>No changes recommended.</p> <p>Action:</p> <p>As part of future work on CIP budget business case, consider general approach (annual decision making) may need to propose longer term budget plans.</p>
Lack of certainty	General	Unclear which programs and how the City will be implementing the CIP.	In May, a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's performance towards meeting targets and initiatives.	<p>No changes recommended.</p> <p>Action:</p> <p>May 2025 HAF CIP implementation report</p>
- "Up to"	WEHBA	Concern about what the actual values for incentive	Acknowledged in the staff report that maximum values will be established by Council year to year along with priorities.	No changes recommended.

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		programs will be. Appears to be subject to change / interpretation	<p>It is the intent that the CIP be used to leverage other senior level of government funding/financing programs. Units will be capped at a maximum value or % of unit cost and may depend on other sources of funding.</p> <p>In May there will be a HAF CIP implementation report that will outline the funding approach for 2025-2026.</p>	<p>Action:</p> <p>Through future implementation discussions consider multi-year commitments of funding and establishing grant values to increase certainty (beyond 2025/2026)</p>
- “to achieve HAF”	WEHBA	Concern values will be lowered to support achieving HAF targets with limited HAF \$.	<p>The values included in the CIP represent the maximum value, and the City may establish lower values.</p> <p>Given limited funds implementation judgement is required based on the current source of CIP funding, which in the first two years relies on the HAF funding, which includes associated targets.</p>	<p>No changes recommended.</p> <p>Action:</p> <p>Future work on budget</p>
- Some programs will not be recommended in short term	WEHBA	Concern that not all programs will be live and funded.	<p>The determination of which programs will be activated will be driven by a number of considerations including funding availability and capacity.</p> <p>By establishing an Affordable Housing CIP Burlington with an effective period of 10 years will permit the City to be better prepared to participate in potential Provincial or Federal funding programs.</p>	<p>No changes recommended.</p> <p>Action:</p> <p>Council will make these decisions based on funding availability, staff capacity, budgets,</p>

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				and/or funding availability.
- no programs?	WEHBA	Concern that no programs will be live	In May, a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's performance towards meeting targets and initiatives.	No changes recommended. Action: Council will make decisions based on funding availability and HAF Principles in May 2025 which will be reassessed in Fall 2025.
-project eligibility	WEHBA	Unclear – need planning approvals in place before CIP? Need clarity when does Council approve?	The CIP establishes the following in General Eligibility Criteria: Affordable rental housing projects linked to an incentive program application shall only proceed after obtaining approval from an application submitted under the <i>Planning Act</i> and/or a building permit, along with any other necessary permits; or, at the discretion of the Director of Community Planning, proceed based on alternate agreed upon terms of the City. These projects must also comply with the Ontario Building Code and all other relevant planning policies, by-laws and	No changes recommended.

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			<p>standards. An application must also be consistent with any other design guidelines or architectural control guidelines or standards that the City may adopt in the future, for example, the Sustainable Building and Development Guidelines.</p> <p>Any CIP programs funded by HAF will be tied to demonstrated ability to achieve building permit by December 2026.</p> <p>The CIP also establishes in the Implementation Section the following related to Council approval:</p> <p>Council will decide on a protocol to determine, on an annual basis, when an CIP program application type or value requires Council approval; otherwise, it is under the delegated authority of the Director of Community Planning.</p>	
Brownfield CIP	WEHBA	Is the City intending to modify the existing Brownfield CIP – in alignment with Affordable Rental Housing TIEG?	As was identified in the staff report future work is required to set the framework for the TIEG program proposed.	<p>No changes recommended.</p> <p>Action:</p> <p>Consider opportunities to leverage the future TIEG work to consider</p>

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				alignment opportunities and to support the implementation of the City's Brownfield CIP including future amendments.
TIEG and no stacking	WEHBA	If the TIEG program does not allow stacking with other programs uptake might not be feasible.	The CIP expressly does not allow stacking with other programs at this time. Further work would be required to ensure the calibration of appropriate levels of funding.	No changes recommended. Action: Consider opportunities to leverage the future TIEG work to consider a wide range of issues including future amendments (see memo for details)
Sustainable and Accessible additional grant lacks detail	WEHBA	Want to understand the nature of the evaluation to determine eligibility. Concerned that you have to have	This is meant to be stacked to include affordability first then additional sustainable or accessible elements. Additional funding is not provided for projects to meet 2024 OBC requirements for accessibility and/or energy efficiency. Projects will have to demonstrate which enhanced sustainability or accessibility	No changes recommended. Action: Through implementation staff will establish criteria as part of application

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		at least one affordable unit	design elements that are being incorporated including any associated costs associated. CIP funds may be subject to review to ensure that they are not covered by another source of grant funding or that the amount of expense exceeds funding.	to ensure a fair evaluation process This will still be a criterion (at least 1 affordable unit).
Further detail on Sustainable and Accessible Grants	Department Comments	Suggest minor modifications to add clarity	Staff are supportive.	Changes recommended. See Section 5.8 and Appendix B, Sustainable and Accessible Design Grant Program, and Section 7.0 Monitoring
Implementation Concerns	CLV	Is there City capacity? Make sure you make the process very easy to navigate	The HAF funded CIP implementation is anticipated to be managed within existing staff resources for 2025-2026. In May, a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's	No changes recommended. Action: Implementation discussions and actions required once CIP is approved.

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			<p>performance towards meeting targets and initiatives.</p> <p>Staff agree that further work is required to support implementation and ensure that the process and expectations are clear. Application forms, agreements and roll out marketing and communication plans will all need to be prepared and refined as the City implements this CIP.</p>	
Affordable unit feasibility a challenge	Ryan Small, Developer	Feasibility challenges	<p>The City's CIP is focused on affordable rental housing in response to Council approved Housing Strategy for more diversity and increasing affordable and supportive housing.</p> <p>It is anticipated that this CIP and its programs are just one way to assist in the creation of affordable rental housing and may act to leverage other senior level of government funding/financing opportunities.</p>	<p>No changes recommended.</p> <p>Actions:</p> <p>Work together to support housing developers in build partnerships to support the creation of additional housing.</p>
Major concern with hydro power upgrade costs	Ryan Small	Hydro issues impact development feasibility	Outside the scope of the Affordable Rental Housing CIP	No changes recommended.
Opportunity for enhancement: TIEG stackable	Janice Spicer	One possible additional support for	The CIP does not currently contemplate a TIEG program for ARUs, nor does it currently allow stacking of City CIP	No changes recommended.

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with ARU forgivable loans.		families could be to provide a TIEG stackable on the ARU forgivable loan.	<p>programs with any City CIP TIEG programs.</p> <p>The ARU forgivable loan value maximums are generous.</p> <p>Further work would be required to ensure the calibration of appropriate levels of funding, and whether a TIEG for ARUs is appropriate.</p>	<p>Action:</p> <p>Consider opportunities to leverage the future TIEG work to consider a wide range of issues including future amendments to the CIP (see memo for details)</p>
<p>COW Comments:</p> <p>Are we being clear about expectations?</p>		Change to clarify in 6.5 that the City shall require an annual statement confirming affordability	Staff agree that shall is a more appropriate direction in this section. Agreements prepared for each program will establish the nature and expectations related to annual statements.	<p>Changes recommended:</p> <p>Clarification provided in sections 5.3 and 6.5 about requiring those annual statements and how they will be evaluated.</p>
<p>COW Comments:</p> <p>Opportunities for shared advocacy</p>		The city should continue to pursue opportunities to work with our partners to identify the order of magnitude change required to support the creation of	<p>Staff agree continued discussions will support better understanding of challenges and opportunities while continuing to define the role of the local municipality.</p> <p>Monitoring, reporting, and evaluating the CIP will be an important part of implementation and will support an enhanced understanding of challenges</p>	<p>No changes recommended.</p> <p>Actions:</p> <p>Consider opportunities to leverage the future TIEG work to consider a wide range of issues including</p>

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		housing to advocate to other levels of government for support.	related to creating new homes and new affordable homes.	<p>future amendments to the CIP (see memo for details)</p> <p>Use CIP to demonstrate the City's commitment to the creation of more diverse housing options and seek to leverage other senior level of government programs and funding opportunities</p>
COW Comments: Financial Implications		Today it is unclear what the financial costs to implement the various programs.	<p>In May, a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's performance towards meeting targets and initiatives.</p> <p>City staff committed to bringing a CIP budget business case to the 2026 budget.</p> <p>Staff agree that clarity and predictability of funding including multi-year budget</p>	<p>No changes recommended.</p> <p>Actions</p> <p>Council will make decisions based on funding availability and HAF Principles in May 2025 which will be reassessed in Fall 2025.</p> <p>As part of future work on CIP budget business case, consider general</p>

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			<p>commitment would be ideal, though may be challenging in practice.</p> <p>Staff will monitor for any new housing funding programs post Federal election that could further fund the CIP and complement a city budget request.</p>	<p>approach (annual decision making) may need to propose longer term budget plans.</p>
<p>COW Comments: Confirm that appropriate safeguards are in place</p>		<p>How will agreements ensure that CIP funds will be used in a way that supports the City's objectives</p>	<p>The CIP establishes General and program specific criteria. The CIP also includes detailed direction on agreements and expectations. The focus of all programs is the creation of affordable rental housing.</p> <p>Staff agree that further work is required to support implementation and ensure that the process and expectations are clear. Application forms, agreements and roll out marketing and communication plans will all need to be prepared and refined as the City implements this CIP.</p>	<p>No changes recommended.</p> <p>Implementation discussions and actions required once CIP is approved.</p>
<p>COW Comments: Affordability period</p>		<p>Expected a longer affordability period for ARU forgivable loan</p>	<p>Staff are supportive of modifying from a 5-year affordability period for full forgiveness to a 10-year affordability period for full forgiveness, in line with the other programs.</p>	<p>Changes recommended:</p> <p>See sections 5.3 and 5.5 and Appendix B</p>

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COW Comments: Implementation considerations		Would a pilot approach allow the City more flexibility to respond to uptake or lack thereof?	In May, a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's performance towards meeting targets and initiatives.	No changes recommended. Action: Council will make decisions based on funding availability and HAF Principles in May 2025 which will be reassessed in Fall 2025.
COW Comments: Implementation considerations		How will we structure the implementation of the CIP in a way that ensures continued partnership with our development partners?	Staff agree continued discussions will support better understanding of challenges and opportunities while continuing to define the role of the local municipality. Monitoring, reporting, and evaluating the CIP will be an important part of implementation and will support an enhanced understanding of challenges related to creating new homes and new affordable homes.	No changes recommended. Actions: Consider opportunities to leverage the future TIEG work to consider a wide range of issues including future amendments to the CIP (see memo for details) Use CIP to demonstrate the City's commitment to

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				the creation of more diverse housing options and seek to leverage other senior level of government programs and funding opportunities
Verbal Comments from MMAH: Corrections, clarifications, questions		Several suggestions for clarification and refinement.	<p>A number of edits have been proposed to address:</p> <ul style="list-style-type: none"> - Referencing City of Burlington housing targets. - Legislative framework clarity and proper references. - Reinforcing minimum affordability periods for all programs - Referencing the need to review the entire CIP as well as all program specific criteria. - Clarifications related to the Deferral program, and - Clarifications related to the Third ARU waiver program. 	<p>Changes recommended:</p> <p>See Sections 3.0; 5.0 and Appendix B</p>
Incentive program funding limits	Survey Response	Need clarity on the funding limits under the incentive programs	<p>Staff agree that funding limits and annual program availability are critical to support the decision to apply for an incentive program.</p> <p>In May a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF</p>	<p>No changes recommended.</p> <p>Action:</p> <p>Council will make decisions based on funding availability</p>

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			<p>program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's performance towards meeting targets and initiatives.</p>	<p>and HAF Principles in May 2025 which will be reassessed in Fall 2025.</p>
<p>Incentive program "up to" values</p>	<p>Survey Response</p>	<p>Should have no funding caps/limitations on the incentive program funding</p>	<p>Given the current limited available funds limits on total grants and total available funds during the 2025-2026 period are expected.</p> <p>In May a HAF CIP Implementation report and budget update will propose which CIPs are best suited to meet the HAF program requirements and targets. Quarterly monitoring and review to adjust any priorities will be made. HAF funding is not guaranteed, and receipt of next funding advance is based on City's performance towards meeting targets and initiatives.</p> <p>City staff committed to bringing a CIP budget business case to the 2026 budget</p>	<p>No changes recommended.</p> <p>Actions:</p> <p>As part of future work on CIP budget business case, consider general approach (annual decision making) and any other changes required to implementation, up to and including amendments to the CIP.</p>
<p>All government levels to participate</p>	<p>Survey Response</p>	<p>Need all government levels to contribute in order to provide</p>	<p>Staff agree with your statement. This need for partnership and collaboration is highlighted in the City's Housing Strategy and is within the Affordable Rental Housing CIP:</p>	<p>No changes recommended.</p> <p>Action:</p>

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		affordable rental rates	Achieving the goal and objectives is a collaborative process, requiring cooperation amongst a broad spectrum of stakeholders, including the private sector, non-profit sector, residential homeowners, and across different levels of government.	Use CIP to demonstrate the City's commitment to the creation of more diverse housing options and seek to leverage senior level of government programs and funding opportunities
Reduce development charges	Survey Response	Rental building DC deferrals already exist – CIP not making rental buildings any more affordable	<p>Staff agree with this statement.</p> <p>The original framing of the DC deferral was not clear. Staff have attempted to clarify and adapt the original DC deferral program to offer interest relief for the City portion of deferred DCs.</p>	<p>Changes recommended:</p> <p>See Section 5.6 and Appendix B:</p> <p>Refined interest free DC deferral program now only applicable to Rental Housing. Reduce percentage of units required to be affordable for eligibility from 30% to 10% and propose interest free on the City portion of the existing required DC rental housing deferral.</p>

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				<p>Action:</p> <p>Use CIP to leverage Regional partnership, interest-free DC payments.</p>
Deeply affordable units	Survey Response	Affordable definition in CIP does not address deep affordability needs/geared to income	<p>Staff agree that the affordable definition being employed in the City's CIP does not address deep affordability.</p> <p>The Region of Halton remains the Housing Service Provider and has a role in creating new assisted housing through its Comprehensive Housing Strategy.</p> <p>The Region is open to discussing opportunities to deepen affordability to the Assisted Level, and to discuss regional tax portion of a tax increment grant program (TIEG)</p>	<p>No changes recommended.</p> <p>Action:</p> <p>Use CIP to leverage Regional partnership, to pursue shared program opportunities, e.g. TIEG.</p>
Community Improvement Area	Staff Initiated	Extent in original CIPA mapping did not include new ROPA 49 Urban Area	The CIPA mapping inadvertently did not include the entire urban area.	CIPA Mapping modified