



AGENDA
AD-HOC PLANNING ADVISORY COMMITTEE
JUNE 9, 2022 2:30 PM

MEETING DETAILS

In-Person Location: Mulmur Township Offices, located at 758070 2nd Line East
Phone Connection: 1 647 374 4685 Canada / 1 647 558 0588 Canada
Video Connection: <https://us02web.zoom.us/j/84602248258>
Meeting ID: 846 0224 8258

1. CALL TO ORDER

2. APPROVAL OF THE AGENDA

Recommendation: THAT the Agenda be approved.

3. APPROVAL OF THE MINUTES

Recommendation: THAT the Minutes of May 19, 2022 be approved.

4. DISCLOSURE OF PECUNIARY INTERESTS

5. ADMINISTRATION

5.1 Mandate Goal #3: Protect Rural Character

- Update policy and definition for “rural character” (Sustainable, G1, A1)
- Review changes to the Provincial Policy Statement to determine viewshed protection (Sustainable, G1, A2)

5.2 Mandate Goal #4: Be Proactive in the sustainable use of non-renewable resources

- Determine protection gaps in revised Nottawasaga Valley Conservation Authority mandate (Sustainable, G2, A2)
- Protect agricultural land and water and forest resources (Sustainable, G2, A4)

6. INFORMATION ITEMS

6.1 Mulmur Township Planning Principles (Jan Benda)

6.2 Rural Character Brainstorming Results

6.3 Draft On-Farm Diversified Uses

6.4 Draft Aging in Place - Housing Policy

7. ITEMS FOR FUTURE MEETINGS

8. ADJOURNMENT

Recommendation: THAT the meeting adjourns at ____ pm and meets again at the call of staff.



MINUTES
AD-HOC PLANNING ADVISORY COMMITTEE
May 19, 2022 3:00 PM

Present: Jan Benda
Paul Cohen
Mike Marchinkiewicz - electronic
Grace Franco Lloyd
Leah Pressey
Lisa Swinton
Tracey Atkinson – CAO/Clerk/Planner

Regrets: Jim MacDougall

1. CALL TO ORDER

The Secretary called the meeting to order at 3:06 p.m.

2. APPROVAL OF THE AGENDA

Moved by Cohen Seconded by Marchinkiewicz

THAT the Agenda be approved.

CARRIED.

3. PREVIOUS MEETING MINUTES

Moved by Benda Seconded by Marchinkiewicz

THAT the minutes of April 13, 2022 be approved.

CARRIED.

4. DISCLOSURE OF PECUNIARY INTERESTS

Chair Pressey stated that members can declare a pecuniary interest now or at any time in the meeting.

5. ADMINISTRATION

5.1 Mandate Goal #2: Pursue responsible growth in residential and employment areas (Summary chart from previous meeting)

- Implement Aging in Place policies in the Township's Official Plan (Prosperous, Goal 2, Action 4)

Members reviewed the list of ideas created at the last meeting. Members discussed parkland dedication, future establishment of public washrooms, and utilizing the term accessible in the Official Plan to address resident's ability to age in place.

Staff will look at the applicability of the Township's accessibility plan.

Moved by Franco-Lloyd Seconded by Marchinkiewicz

THAT the Planner receive the input from the Committee regarding Aging in Place for reference as part of the Official Plan Amendment.

CARRIED.

5.2 Mandate Goal #3: Protect Rural Character

- Update policy and definition for "rural character" (Sustainable, Goal 1, Action 1)

Members conducted a brainstorming session to determine what makes something rural. Members reviewed the current rural character definition, expressing a desire for broader and separated ideas rather than specific definitions including current Official Plan Section 5.35:

"All development including new roads, road improvements, service corridors, subdivisions and individual lots should be in harmony with the natural, scenic and rural landscape and/or the built environment, as applicable."

Discussion ensued surrounding whether rural character applied to Mulmur's villages and hamlets. Members will look into the feasibility of two definitions, one for the rural countryside and one for the urban areas, at a future meeting.

6. INFORMATION ITEMS

6.1 Current Character Policies

6.2 Survey Response on Rural Character

6.3 Current Scenic Value Policy

6.4 Council Motion regarding Official Plan Workplan, May 4, 2022

7. ITEMS FOR FUTURE MEETINGS

7.1 Mandate Goal #3: Protect Rural Character

- Update policy and definition for "rural character" (Sustainable, Goal 1, Action 1)
- Review changes to the Provincial Policy Statement to determine viewshed protection (Sustainable, Goal 1, Action 2)

7.2 Mandate Goal #4: Be Proactive in the sustainable use of non-renewable resources

- Determine protection gaps in revised Nottawasaga Valley Conservation Authority mandate (Sustainable, Goal 2, Action 2)
- Protect agricultural land and water and forest resources (Sustainable, Goal 2, Action 4)

8. ADJOURNMENT

Moved by Marchinkiewicz Seconded by Cohen

THAT the meeting adjourns at 4:53 pm and meets again on June 9, 2022, June 23, 2022 and July 7, 2022 at 2:30 pm, or at the call of staff.

CARRIED.

VISION STATEMENT

CURRENT OFFICIAL PLAN OVERALL VISION STATEMENT

The Township is committed to sustainable growth while protecting the environment, natural resources and agriculture as well as the scenic beauty and the rural and community character of the Township. The Township wishes to achieve balance between the many competing land use interests, so that the Township remains a complete community – a highly desirable, safe, prosperous, beautiful and natural place for its residents to live, work, learn and play.

FIRST DRAFT OF A GARDEN TOWNSHIP VISION STATEMENT

Mulmur is committed to sustainable and proportional/balanced/healthy/strategically located growth while protecting the environment, natural resources and agriculture. Mulmur desires to develop into a garden township facilitating the rural lifestyle and providing for development in a manner that does not predominate the natural landscape.

GARDEN TOWNSHIP

FIRST DRAFT OF DEFINITION OF GARDEN TOWNSHIP

(ITALISIZED AND USED THROUGHOUT THE OFFICIAL PLAN)

Garden Township means: a geographic area that is dominated by its natural heritage, comprised of various focal developments and settlement areas nestled amongst/within a natural and maintained landscape and cultivated parcels. A garden township has rural character, tight communities and provides for a range of passive recreation and amenities to its residents.

POLICIES TOPIC AREAS

- Lot coverage
- Height
- Separation distances, setbacks
- Densities
- Landscape buffers, minimum tree planting requirements for all building lots
- Landscape areas, open space percentage requirements
- Site plan approval for all commercial, institutional, industrial, (including home industries) on-farm diversified uses, second dwellings and larger non-agricultural buildings (such as dwellings with a floor area in excess of ____m²), such that the natural landscape and/or agricultural cultivation continue to dominate from a visual perspective
- Plans of subdivision to be assessed with criteria typical for parklands, and to incorporate walkability, open space, trees, vegetation, community meeting areas, features and focal areas etc. to mirror a garden atmosphere.
- Dark sky policies to apply to develop that is subject to site plan approval
- View shed analysis requirement triggers to apply to all applications requiring an Official Plan amendment and criteria for assessment
- Building elevation requirements requirement for site plan control applications

RURAL CHARACTER

FIRST DRAFT OF RURAL CHARACTER DEFINITION

(TO APPLY TO THE COUNTRYSIDE AREAS BUT NOT SETTLEMENTS)

Rural Character means: a mix of agricultural uses, vacant open spaces, woodlots and low density, randomly located dwellings in a predominantly rural and natural setting. It is distinguished by open countryside, fields, fencerows and forested areas. The impression is one of an open, natural and cultivated landscape rather than one dominated by vehicles, man-made structures, large buildings and industrialization.

FIRST DRAFT OF RURAL CHARACTER POLICY

To become a *Garden Township*, the Township will need to remain a rural municipality characterized by large open spaces with a generally dispersed development pattern in rural areas to preserve its *Rural Character*.

The density of development within settlement areas will be based on the availability of appropriate services, and must preserve and positively contribute to community character while contributing to the overall feel/experience of the *Garden Township*.

Developments within the settlements and employment area are encouraged to be reflective of and compatible with the definition of *Rural Character*. Larger scale development outside of settlement areas shall be assessed and the visual impacts mitigated to the extent feasible, while balancing with competing interests and priorities, such that the built form does not predominate over the natural environment.

Agricultural and outdoor recreational developments and uses are part of what is also expected in the Countryside and are part of the character of Mulmur.

SCENIC RESOURCES, VIEWSHEDS, DARK SKY and FEATURES

FIRST DRAFT OF POLICY TO SUPPORT GARDEN TOWNSHIP & RURAL CHARACTER

Significant scenic resource areas within the Township are generally within the Niagara Escarpment or extend from the Escarpment features.

In order to ensure the preservation of the scenic resources and the overall visual attractiveness and *rural character* of the Township, the Township shall assess, on a case by case basis, the need for visual impact assessment studies in support of development proposals requiring approval under the Planning Act where such development has the potential to impact on the scenic resources within these areas.

An assessment shall evaluate the visual impacts of developments and ensure that developments which are not appropriate from a visual impact perspective are not permitted, and that all other development is designed in such a way as to reduce visual impacts to acceptable levels. A variety of mitigation measures may be required as conditions of development approvals to address visual impacts.

Developments that are unusually tall, colourful, reflective, expansive or involve movement, and/or the extensive alteration to natural vegetation or the natural contours of the land are generally regarded as having the highest potential impact. Impacts of such developments and site alterations are also the most difficult to mitigate.

The Township desires to limit light pollution and conserve energy by protecting a dark sky. A lighting study shall be required for all new development subject to an approval under the Planning Act and where there is a potential for dark-sky infringement and where lighting is directed upward or not equipped with motion sensor technology.

Excerpt from June 1, 2022 Council Minutes (Draft)

13.1 Official Plan Workplan – Environmental RFP

Tracey Atkinson, CAO/Clerk/Planner presented the impacts of the natural heritage system mapping and the effects on Mulmur's Official Plan process, proposing that Development Charges planned for the Official Plan amendment be used to contract the expertise necessary to address the areas of environmental protection.

Discussion ensued on costing, trees and declining agriculture.

Moved by Boxem Seconded by Clark

THAT Council receive the report of Tracey Atkinson, Official Plan Workplan – Environmental RFP.

Subject: FW: AD-Hoc Planning Advisory Committee Meeting - May 19th

From: Jan Benda
Sent: May 27, 2022 5:33 AM
Subject: Re: AD-Hoc Planning Advisory Committee Meeting - May 19th

Hello all,
I would like to share with you some ideas regarding the rural character issues that we discussed during the last meeting. Please tolerate to my English but i hope you would understand the meaning of it. If you have any comment or would like to add something, that would be great.
Thank you
Jan Benda

MULMUR TOWNSHIP PLANNING PRINCIPLES

While trying to define the meaning of “rural character” of the Mulmur area, we as a Ad-Hoc advisory committee write a long list of individual elements using pictures from the Mulmur area as an inspiration. That was the starting point. Unfortunately we didn’t get any satisfactory result. The fundamental question is:

- how to connect the dots?
- how to make a sense of it?
- how to put together a simple story that would describe the Mulmur rural character?

According to my understanding and the experience we should start with the “rural lifestyle” and than to try to establish values of the “rural character”.

Having said that I believe that the key issue here is the vision. The paragraph “Vision” in the existing planning document is very generic, using universal and conventional phrases and cliches. From my past experience the vision must be:

1. Short - 10 to 25 words max. that would capture the essence of Mulmur planning intension
2. Easy to remember
3. Direct
4. Specific

One example which comes to my mind is:

*“Mulmur will develop into the **garden township** reflecting the rural lifestyle of its residents and supporting the quality and values of the natural environment”.*

What this type of vision is referring to?

Garden township:

- *Garden township means development of the settlement that would capture the primary benefits of the countryside as well as the urban concepts while minimizing the disadvantages of both*
- *For the development of Mulmur as the garden township means to capture a hidden spirit and informal beauty of the Canadian wilderness. It’s not the ecology or scientific knowledge; it’s more the feeling and experience that is will be unique and draw the interest of residents.*
- *Garden township is a planning concept of one anchoring town and satellite houses, farms or villages.*
- *Garden township means the land containing proportionate areas of residences, industry, recreation, services and agriculture. Proportions of individual parts should be based on the existing land use, residents needs, planning requirements etc. The proportion of different elements can be changed and balanced over time according to Mulmur social development.*
- *Garden township will directly reflect the rural and urban lifestyle.*
- *Garden township doesn’t mean that whole Mulmur - the area within its administrative borders - must be treated as one garden or park, but it rather should be understood as a number of smaller “gardens”, well defined and related areas that would have specific character and position within the Mulmur township.*
- *A development of the garden township would be managed and regulated by set of rules considering specific character of individual “gardens”.*

Garden:

- *The countryside around Mulmur can resemble at certain point of view - with its forests and rolling hills - the 18th century English countryside that is presenting a romantic view of nature. It's not the style of landscape that might be fascinating but rather the character of parkland where the intervention of man is almost indistinguishable from the work of God. We could call it or characterize it as a garden!*
- *A garden in our case means a man made and maintained landscape*
- *Garden is also a synonym for the word "park"*
- *As the word "garden" deriving from the word guard or guarded, it means protected piece of land.*
- *A garden means land or landscape with the specific environmental and aesthetic values*
- *A garden means place where nature is cultivated by man with the specific ideas and values in mind (sustainability, climate change, global warming, protection of disappearing species, testing local or new plants...)*
- *A garden means space where food is grown and harvested in a small scale. This is referring to family farms as well as fruit and vegetable gardens*
- *A garden means human scale environment, with romantic nooks, meadows and solitary trees, gazebos, pavilions, walking bridges, places for picnics, walk, areas for games, outdoor activities, etc.*
- *Specific form of the garden is an arboretum, garden oriented towards collecting and studying trees (local trees), sustainable farming and foresting etc.*
- *The magic of Mulmur garden township will not be in the natural and uneven formality but in feelings what such countryside could reveal. Everything could be achieved by what nature already offers - trees, bushes, grass, flowers and water in combination with houses and man made elements organized by the creative mind.*
- *In order to create the garden township is clearing the neglected areas, exposing the beauty of various solitary trees, create sceneries and if you imagine, colours that are changing during the day and seasons, morning mist, sparkling dew, sun, blue sky, morning light filtering through leaves: that would be more than enough to create spectacular drama!*

Anchoring town or village:

- *Anchoring settlement means concentrations of services, facilities and development into one place*
- *In an ideal situation the anchoring settlement would be a place of natural gravitation of people - if possible in the centre of the area (Terra Nova). The question would be what everything must be done in order to start planning and developing anchoring town - feasibility study!*
- *While Mulmur township in the present time doesn't have its centrally located small town the creation of an anchor settlement should be a key part of the planning principle. Mansfield or Haneywood are at the township perimeter.*

Rural lifestyle (rather than rural character):

- *The rural lifestyle is the key here. It should be superior to rural character.*
- *Rural lifestyle can represent slower pace, self supporting community and many other thing which people - living currently in Mulmur - experiencing in first hand*
-

Rural physical character

- *It cannot be based on the aesthetic preferences but on values of qualities*
- *Aesthetic standards are subjectives and related to short term fashion and trends*
- *Natural scenery and architecture should be seen just as a background for the beautiful adventure called life.*

The vision ideas presented here (just as an example) can give to residents as well as city council very specific guiding principles for planning and decision making process. The vision statement must be a practical tool helping to draw a real picture of the township not just fancy words.

PLANNING PROCESS

Mulmur township is surrounded by several townships - Mono, Melancthon, Amaranth, Adjala and Clearview. It is evident that the administrative borders are not following any natural or logical lines - borders of all of them are just a bureaucratic decision. So because high degree of people's mobility the existing points of natural gravitation of people does not respect the strait borderlines of townships. For the planning purposes it is necessary to consult and coordinate planning activities along Mulmur borders inside neighbouring townships.

PLANNING TOOLS

Today's city planners are facing great number of challenges in regards to climate change, excessive use of energy and material resources, land management, mounting waste etc. Countries and cities are unable to manage their budgets balanced. Planning management tools given to planners are zoning and bylaws. This system was introduced about 100 years ago, it developed into the more sophisticated form and is widely used in North America and developing countries. However according to crisis and catastrophic problems the result is not so satisfying. Even though Mulmur is in relatively good shape it's our duty to ask, if the present planning system is really effective, if we can do better, if our planning tools are good enough to fight the outstanding environmental issues, if we would be able to leave Mulmur township at least as good as we inherited it from our ancestors.

The question is how to approach and make a decision regarding the planning issues

Option 1 - zoning principles process - ZP

- *Zoning is a restrictive planning system, rigid and predictable*
- *It's relatively simple and easy to apply, transparent and more or less fair*
- *However I believe when we are living in the digital age with smart technology to our disposal this system is getting obsolete*
- *It's not flexible and in the most cases unable to accommodate unconventional, innovative and outside the box development,*
- *It's unable fast react to the economical, political and social development, real estate price change etc.*
- *We don't need to describe how it works, we know that*

Option 2 - individual project approval process - IPA

- *IPA is a creative planning system*
- *It is time consuming, expensive and long process*
- *It require professional staff at the planning department*
- *It can be easy to misuse it, it can get corrupted*
- *It may allow for unique and creative development if the design is right, planning department is open for unconventional solution and willing to take a risk*
- *It's lengthy process demanding on professional planning department staff*
- *It may not be transparent or fair process*

Option 3 - evaluating principles process - EPP

- *Setting the evaluating criteria - for land use, construction and business activities*
- *Criteria may stress preferences, demand and undesirable activities*
- *Criteria should respect existing zoning and bylaws but not rigidly - with some degree of flexibility*
- *Each criterion would be awarded with some points*

- *Total points will give to the planners a picture which would reflect the over all situation of the project. However the system is ready - if some criterion is not acceptable and regardless the points on other criteria - total rejection*

Those are just tools, nothing more. They need to be developed, improved etc. If we can combine those systems and get them ready for practical use, set the guards against corruption and abuse we may get the system, which may propel Mulmur into garden township, that would be

- *Great to live in*
- *Friendly to seniors and people with the special needs*
- *Balanced and safe*
- *Allow to develop rural lifestyle and character*
- *Attractive to residents as well as visitors*
- *Bring the much needed the revenue to the city chest*
- *Prevent undesirable development*
- *Reflect resident's preferences*

POINT EVALUATION SYSTEM

Example -	sawmill	pottery studio	dairy farm
General			
Primary business	x		x
Secondary business		x	
Other			
Zoning			
Agriculture			x
Residential		x	
Industrial	x		
Others			
Parameters			
Total land area	10 acre	0.8 acre	550 acre
Farmland	0	0	90%
Buildable	10%	20%	10%
Total GFA needed			
Existing	0	450 sf.	50 000 sf
New	20 000 sf.	100 sf.	50 000 sf
Business category (township preferences points)			
Service			
Agriculture			6
Home business			
Small business		8	
Retail			
Hospitality			
Health			
IT of software			
Culture, sport, recreation			

Construction	4		
Auto industry			
Startup			
Education			
Special quality business			
Other			
Financial issues & tax revenue			
Contributions to the city revenue	7	1	5
Supporting local businesses	2	4	4
Community benefits			
Benefits to local community	3	5	3
New jobs full time, part time	8	0	5
Temporary jobs	5	2	5
Enriching community life	1	5	2
Contribution to a social sustainability	2	5	4
Special			
Culture, sport, recreational			
Benefits to community	0	3	2
Employment			
Bringing			
Environmental issues			
Sustainability	6	3	3
Carbon footprint	3	5	1
Net zero construction	2	6	3
Pollution	2	3	2
Noise	1	7	4
Smell	5	8	1
Traffic	3	8	4
Using local resources	6	3	5
New landscape (trees, wetland,	2	4	2
Community benefits			
Benefits to community	3	2	3
Special skill workers	3	9	1
Special industry	3	8	1
Secondary positive impact			
Creating special character	0	7	0
Creating spot of destinations	1	5	0
Conditions for community development	1	2	1
Secondary negative impact			
Parking	no	no	no
Hi traffic	no	no	no
Heavy load traffic	yes	no	yes
Night shifts	no	no	no
<hr/>			
TOTAL POINTS	69	113	66

RURAL CHARACTER BRAINSTORMING RESULTS

1) Homes, Buildings, & Towns

- Small town
- Walkable compact development- lot size needs to be larger
- Row houses with courtyards in the middle
- Low pitch/ height
- Shingles
- Preserved architecture
- Compact development
- Wood fences
- Dirt roads
- Empty Roads
- Parking at the rear
- Wood siding
- Walkable Roads/ Kid friendly roads

2) Landscape & Terrain

- Open landscape
- Undeveloped landscape
- Make it look like it belongs in the landscape
- Pastures
- Trees
- Access to water
- Nature/ natural
- Green

- Farmland/ cultivation
- Open Sky
- Big sky/ clouds
- Animal Life (“it was their world first”)
- Wide open spaces
- Views
- Lack of development
- Natural landscape dominates
- Scenic escapes
- Brown fields

3) Life, Community & Culture

- History, culture, and character
- Community
- Easy going
- Safe family environment
- Low light
- Quiet
- Trusting
- Isolated
- No traffic
- Family outings
- Bicycle friendly
- Look at each town as a park
- “For free and for fun”

4) Businesses & Stores

- Farmers Market
- Independent shops/ shop local
- Farmland/ food
- Local dining
- Small town enterprise
- Diverse home business
- No billboards/ hand crafted signs

6.1.6 ON-FARM DIVERSIFIED USES

All on-farm diversified uses shall be designed to not hinder surrounding agricultural operations and be appropriate to available rural servicing and infrastructure. They shall be located on a farm that has a farm dwelling, and either within the building cluster, on fallow lands or on the lowest quality of lands. The on-farm diversified use may occupy no more than 2% of the property on which the uses are located, to a maximum of 1 ha, and the building shall be limited to 20% of the 2% of the lot area. The floor area of farm building that existed prior to 2012 may be used in the on-farm diversified use and calculated at 50% floor area towards the maximum 20% of the 2% lot area.

Commented [TA3]: Description utilizes terminology and ideas from Ad-Hoc tracking table

Site Plan approval shall be utilized in accordance with Section ## to ensure for the appropriate development of the lands and to maintain rural character.

On-farm diversified uses are subject to the study requirements and all other applicable policies of this plan.

Commented [TA4]: Policy ensures that Environmental policies adhered to, as well as proper noise studies, and certificates of environmental approval where required.

On-farm diversified uses: means uses that are secondary to the principal agricultural use of the property, and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agritourism uses, and uses that produce value added agricultural products. Ground-mounted solar facilities are permitted in prime agricultural areas, including specialty crop areas, only as on-farm diversified uses. (PPS, 2020)

Commented [TA5]: New definition to be includes is verbatim of Provincial Policy Statement

5.4 HOUSING

To provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the Dufferin County market area, the Township shall strive to:

- a) maintain the ability to accommodate residential growth for a minimum of 10 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development; and
- b) maintain land with servicing capacity sufficient to provide at least a 3 year supply of residential units. This shall be achieved by making available lands which are suitably zoned to facilitate residential intensification and redevelopment, lands in draft approved and registered plans of subdivision and existing vacant lots.

~~The Township shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the County of Dufferin market area by ensuring c) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons) d) encouraging~~ that a minimum of 25 percent of residential housing within settlement areas is affordable to low and moderate income households. This shall also be achieved by permitting forms of housing appropriate for each settlement area, to meet the social, health and well-being needs of current and future residents, including special needs requirements, housing geared to older persons and through residential intensification and redevelopment.

The development of new housing shall be directed towards locations where appropriate levels of infrastructure and public service facilities are, or will be made available to support current and projected needs.

Densities for new housing which efficiently use land, resources, infrastructure and public service facilities will be promoted within the limitations of proposed servicing options, the desire to preserve and enhance the character of settlement areas and the need to protect the environment, water resources and water supplies.

Development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of –public health and safety, shall be formulated and implemented.

Commented [TA1]: Same wording as first sentence.
Combine

Commented [TA2]: Verbatim from PPS, 2020.
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

Market area = Dufferin