May 10, 2024

Submitted online and via email to minister.mah@ontario.ca

The Honourable Paul Calandra
Minister of Municipal Affairs and Housing
Government of Ontario
17th Floor – 777 Bay St.
Toronto, ON M7A 2J3

RE: ERO 019-8369: Schedules 4, 9, and 12 of Bill 185 - the proposed Bill 185, Cutting Red Tape to Build More Homes Act, 2024

Dear Minister Calandra,

The City of Guelph (the "City" or "Guelph") appreciates the opportunity to comment on the Province's proposed legislative amendments introduced in schedules 4,9 and 12 of the proposed Bill 185. In this submission, you will find the overall comments and recommendations from the City of Guelph regarding the proposed changes.

Contents:

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Reduced Parking Minimums:

This proposed amendment to the Planning Act would not allow the City to require parking for development located within the Downtown Secondary Plan (DSP) area, as our entire DSP area is a Major Transit Station Area (MTSA) through the Official Plan.

It is not clear if this change is only applicable to residential development or if it is also applicable to non-residential development. The proposed change would allow for developers/homebuilders/homebuyers to decide the appropriate number of parking spaces for new development near higher order transit, based on market demand.

Guelph's Downtown is made up of a number of areas including the historic commercial core, a mix of residential and commercial uses south of the Metrolinx rail corridor and a mix of higher and lower density residential uses east of the Speed River and on the outer edges of the DSP area.

While staff generally support reducing minimum parking requirements where development is supported by a viable mix of transportation options (i.e. efficient/frequent transit) and other transportation demand management (TDM) measures (i.e. car share), completely eliminating minimum parking requirements should be done in a context-sensitive manner.

Below we provide several considerations that influence parking policy in Guelph's DSP area:

1. Guelph's Downtown Parking Master Plan:

   In September 2023, Guelph City Council approved the Downtown Parking Master Plan and directed staff to develop a Payment-in-lieu of Parking program. The Downtown Parking Master Plan was completed to prepare for growth in Downtown Guelph to 2051 in alignment with the updated Official Plan and the City of Guelph Housing Pledge: By Guelph, For Guelph.

   Like linear and underground infrastructure, parking infrastructure can foster both residential and non-residential development. Guelph's Downtown Parking Master Plan contemplates methods to utilize the City's parking infrastructure to achieve the City's Housing Pledge and promote economic and commercial vitality Downtown, including introducing a Payment-in-lieu of off-street parking policy to increase flexibility for developers in order to develop more housing while adequately supporting the City's ability to manage and provide parking infrastructure to support the long-term vitality of our Downtown. The Downtown Parking Master Plan specifically did not recommend no parking minimums Downtown. Such a policy eliminates the feasibility of the recently adopted Payment-in-lieu of Parking Policy, a key source of funds for future supply. The Parking Master Plan estimated that City's Payment-in-lieu of Parking policy could contribute approximately $600,000 annually towards the Parking Payment-in-lieu Reserve Fund to support the future supply in the public parking system. Without this key funding source, any future expansion of the City's public parking system will be a direct tax levy impact to our community, exacerbating affordability concerns. Alternatively, the Province

could establish funding to support public parking in Major Transit Station Areas.

The Parking Master Plan examined area specific data to determine what the appropriate parking minimum rate was for Downtown Guelph and concluded that a parking rate of 0.85 parking spaces per residential unit is generally what residential development Downtown requires to meet the market demand. This conclusion was reached based on two data sets:

- Recent parking justification studies submitted to the City in support of Downtown developments have recommended parking rates between 0.75 and 0.85 spaces per unit to adequately support residential development provided that appropriate TDM measures are implemented for the development.
- Parking utilization studies/surveys of residential apartment buildings (mix of rental and condominium) undertaken in the Downtown as part of the Parking Master Plan to understand residential (resident and visitor) parking demand.

The amendment to the Zoning Bylaw to reduce the parking rate from 1.0 to 0.85 spaces per unit was approved by Guelph City Council and subsequently appealed to the Ontario Land Tribunal. It is not yet in effect due to the appeal.

2. Downtown Infrastructure Renewal:

   The City of Guelph is also on the cusp of beginning several years of infrastructure reconstruction throughout our Downtown to support additional residential density in our Major Transit Station Area. The municipal parking supply that we currently have available will be key in supporting the vitality of our Downtown throughout these years of construction. If the supply has to be available for future residential units when not enough parking is provided by residential developers, it will not be available to provide balanced support to Downtown businesses and services overall. Further with the loss of Payment-in-lieu of Parking, funding the development of future municipal parking supply will be challenging.

3. Guelph Transit:

   Recent budget constraints have slowed the City's ability to expand and improve transit service in the City. Guelph Transit's Future Ready Action Plan 2022 sets a vision "to create a competitive, convenient and reliable transit network that meets the needs of today's and tomorrow's customers" over a 10-year horizon, however, Council has already made decisions to extend the horizon to 12 years. At present, Guelph Transit is not yet operating at a level that supports it as a viable transportation alternative for everyone.

4. Interregional Transit:

   Guelph is a destination for many trips that originate outside of the city from surrounding rural areas and smaller towns. The surrounding region has

limited or no transit service, meaning the majority of external originating trips are made by car, even if it is to access regional transit such as Metrolinx GO Trains and busses. Guelph is among few Protected Major Transit Station Areas where this is a factor. The PIL program is intended to support the construction of future parking facilities to support forecasted demand for parking, especially to support those who have no alternative to arrive Downtown. All MTSAs are not alike. Guelphs Go station is based on a future planned update to service which would include two way all day service – at this time the date is uncertain. The proposed legislation would apply to all MTSAs equally and will result in increased pressure on Metrolink to provide all day service. Thus, the provisions that prohibit minimum parking requirements should be removed in Bill 185 until such time as there is equality in the level of service across MTSAs.

Requests to Province:

Given the context of Guelph's Protected Major Transit Station Area, the City of Guelph requests that the City continue to be permitted to require a minimum amount of parking for development in our Downtown (as appropriate) and commits to reviewing further reductions to the minimum parking requirement:

- as transit service (including GO service to two-way all day) is improved;
- each time the City's Parking Master Plan is reviewed; and
- on an ongoing and continuous basis for site specific developments

Should the Province decide to proceed with this amendment then we recommend that:

- it be paired with requirements for new development to provide transportation demand measures to support new development; and
- it consider making municipal parking an eligible DC service to aid in the development of shared parking; and
- it not be applicable to non-residential uses, lower-density residential uses, visitor and accessible parking; and
- it be paired with commitments from both the provincial and federal governments to support the expansion and enhancement of the City's transit system to avoid potential conflicts related to the removal of parking requirements.

Revised MZO process to replace the CIHA:

The City appreciates the Provincial government's effort to set out a transparent process for the intake of new requests for zoning orders ("MZOs") made to the Minister of Municipal Affairs and Housing ("the Ministry"). MZOs are best when done in collaboration and cooperation with municipalities. The City supports the removal of the CIHA and that only one tool with enhanced provisions be necessary.

The City does have some overall concerns with the use of MZOs as a planning tool that the Provincial government should address through this framework:

1. Increased use of MZOs could jeopardize the effectiveness of municipal planning policies and zoning by-laws that have been developed in conformity with the Provincial Policy Statement ("PPS"):

   Including municipal expertise in decision-making is necessary to ensure efficient and effective local planning that is sensitive to context-specific matters as well as the wider range of issues in the municipality. This is particularly relevant on matters such as the availability of infrastructure, services, and other matters of local interest. The City's planning policies, which include tools like its Zoning By-law, are developed with Provincial policy direction in mind. The City requests that all MZOs, regardless of applicant, require extensive municipal involvement and support.

2. Increased use of MZOs could create delays in planning approvals:

   The City continues to support the distinct roles of the Province of Ontario in providing governing planning legislation and policy, and of municipalities in implementing this legislation and policies through Official Plans and Zoning By-laws. Municipalities are best equipped to review development applications and work with their development partners to create complete communities that are consistent with Provincial policy. By "uploading" development applications and approvals to the Province of Ontario through MZOs, the City is concerned that this may create bottlenecks, increasing the time for Official Plan approvals from the Minister, and delaying development. Increased use of MZOs could undermine public trust in the planning process:

   The City requests that the Province of Ontario consistently provide a clear planning rationale and justification for the approval and refusal of MZOs, regardless of the applicant.

Additional Comments and Concerns:

Regarding the recently released Zoning Order Framework, the City appreciates that the Ministry is providing a framework for the application and approval of MZOs that includes thresholds for applications, submission expectations, and a process for decision-making. As MZOs prevail over existing municipal zoning by-laws, the City requests that all MZO applications be required to demonstrate how they are consistent with and conform to the urban structure and growth management strategy of a particular municipality. The urban structure and growth management strategy of a municipality is the basis for several infrastructure-related master plans which provide direction on upgrading various infrastructure assets. In Guelph, this is of particular concern, as the City is a groundwater-dependent municipality with limited groundwater supply.

The City is also particularly concerned that MZOs do not have to demonstrate consistency with the Provincial Policy Statement (or the proposed Provincial Planning Statement), which is the basis for planning policy in the Province of Ontario.

Without the requirement to complete a Municipal Comprehensive Review, a Land Needs Assessment, or to revise those materials from a previous Official Plan update, there is no ability or resourcing to update infrastructure-related master plans to be consistent with newly established growth. As previously noted, the City is a groundwater-dependent municipality, with drinking water supply presenting a very real limit to the City's capacity to plan beyond its current population growth to 2051.

As the proposed statute proposes that the Minister "may also use enhanced authorities when making a zoning order", the City has further concerns with the potential for the removal of municipal use of site plan control for MZOs. If site plan control is eliminated the City may be unable to mitigate potential impacts of development, such as stormwater management and other natural heritage and water resource-related impacts. The site plan process is also crucial for ensuring that matters of public health and safety are considered in the design of a development. This can include planning for natural hazards such as floodplains and the management of vehicular traffic. Liability for health and safety-related matters will still fall on the municipality if not appropriately considered through the planning process. The City therefore requests that exemption from site plan control be removed from the proposed MZO framework.

The City requests that further clarity be provided on what the Province considers as "environmental approvals", and that environmental approvals should always include assessments related to Natural Heritage Systems, including but not limited to, stormwater management, environmental impact reports, tree permits, applicable species-at-risk approvals, Permits To Take Water and Environmental Compliance Approvals.

Regarding instances of refusal, the City would be supportive of the development of "refusal criteria", to make it explicit when MZOs would be refused. The City would suggest that this "refusal criteria" include the availability of infrastructure capacity, an effective stormwater management strategy, and the protection of all Natural Heritage System features and water resources. As well, the City would support a revocation threshold that if a majority of the land is sold after the issuance of an MZO by a non-governmental applicant, that the MZO be revoked.

"Use It or Lose It" Tools (Lapsing Provisions):

Bill 185 Schedule 12, part 8(3):

The City supports the proposed amendment to the *Planning Act* to have site plan approvals lapse where a building permit is not issued within a prescribed timeframe; this is something the City was considering including as part of an update to its Site Plan Control By-law.

Introducing lapsing provisions for site plans would incentivize approved developments to proceed in a timely manner. It would also allow the City to ensure developments that have been sitting for long periods of time without obtaining a building permit to withdraw the approval and have the proposed development come back in through the site plan process (at such time as the

developer, or subsequent owner is prepared to proceed), and be required to adhere to current development standards, policies and requirements.

While the City supports the proposed amendment, clarity is sought with respect to the following:

- Lapsing of site plan approval where a building permit is issued to implement an approved site plan, but ultimately revoked because construction didn't proceed in the required timeframes under the *Ontario Building Code*.
- Approved site plans which include multiple buildings/phases, where a building permit has been issued for at least one (1) building, but not the entire scope. The City respectfully recommends that developers be required to obtain permits for the entirety of the site within a prescribed timeframe, and failing this, be required to amend their site plan approval to remove the building(s)/ associated works that weren't completed.
- A 60 day timeframe should be required to execute the agreement and provide securities to match the municipal commitment to review the application.
- The logistics/mechanism to release Site Plan Control (SPC) agreements from title for sites for which site plan approval has lapsed, and for the associated release of securities where no development has occurred and/or where partial works occurred that did not require a building permit (ie. site grading, tree removals, etc.)

Bill 185 Schedule 12, part 10(3):

The City supports the proposed amendments to the *Planning Act* to require mandatory lapsing provisions for draft plans of subdivision. The proposed amendment is in line with the City's current practice of specifying that draft plan of subdivision conditions are valid for a period of five (5) years from the date draft plan approval is issued. Where subdivision registration has not occurred in this timeframe, an extension under Section 51(33) of the *Planning Act* is required to extend the draft plan of subdivision conditions as needed.

Bill 185 Schedule 12, part 10(4):

The City supports the proposed amendments to the *Planning Act* to have draft plans of subdivision approved before March 27, 1995 lapse if not registered within 3 years of Bill 185 passing. The proposed amendment will not impact any approved draft plan of subdivisions in the City of Guelph.

The City is seeking clarity as to whether the March 27, 1995 date would be reviewed and revised as part of future amendments to the *Planning Act*.

"Use It or Lose It" Tools (Servicing Capacity Allocation):

The City supports the proposed amendment to grant municipalities authority to enact by-laws to track water supply and sewer capacity and set criteria for when an approved development can have its allocation withdrawn. As a municipality reliant on groundwater for our drinking water sources and the assimilative capacity of local watercourses to accept treatment wastewater volumes, this

enhanced allocation process will be an important tool for managing available servicing capacity.

Additionally, this proposal would help provide water-constrained municipalities with dedicated tools to manage water capacity, and avoid the reliance on holding provisions, which has the potential to create a more favourable environment for homebuilders.

The City is seeking clarification with respect to the regulations the Ministry is exploring exempting for any individual approved development or classes of approved developments. Furthermore, if the Ministry is considering exempting the entirety of a by-law passed by a municipality under proposed Section 86.1 (1) of the *Municipal Act*, having a framework or guidance tool to clarify the intent of this amendment would be beneficial prior to municipalities moving forward with the preparation and enactment of any such by-laws. The City strongly recommends further consultation with municipalities.

Third Party Appeals:

The City is in support of the proposed amendments to the *Planning Act* to restrict third party appeals to "specified persons" who have actively participated in the municipal process.

Over the past eighteen months, since similar provisions in Bill 23, *More Homes Built Faster Act, 2022* were removed from that Bill's original draft, the City has been required to expend a disproportionate amount of its legal and planning resources on two third-party appeals. The first of these was an appeal taken by against a secondary plan which was enacted after five years of public consultation and a phased community process. The second involved appeals to a City-wide comprehensive zoning by-law ("CZBL") that aimed to (i) modernize the City's zoning approach from a dated 1995 instrument, (ii) pre-zone lands to permit intensification, and (iii) give effect to official plan amendments which were overdue for implementation.

In the City's experience, multiple years of robust public consultation to bring forward these City led instruments are inevitably met with a comparable cost and sometimes duration before the Ontario Land Tribunal. Often the parties who file appeals do not meaningfully participate in the municipal consultations, choosing to file a last-minute letter through a lawyer or planner, followed by an appeal. The City's secondary plan appeal, while it progressed comparatively rapidly through extensive efforts at mediation to a resolution in approximately 15 months, still cost the municipality more than $500,000 in external legal and consulting costs to supplement an internal team of more than half a dozen disciplines and an internal lawyer and articling student devoted about 50% to that initiative. The CZBL appeal has just passed its first anniversary and will likely match or exceed this cost and, if the course is not altered by Bill 185, take well in excess of its duration.

The unfettered resort by private third parties to appeals before the Ontario Land Tribunal has many effects beyond the very real impact on the municipality's fiscal

and human resources. Third-party appeals significantly hamper the City in being able to implement provincial legislation, as the appeals delay the implementation of these initiatives. For example, although Guelph anticipated provincial direction on additional residential units ("ARUs"), the implementing provisions in the City's comprehensive zoning by-law passed in April of 2023 have been held hostage by appellants who have included them in a sweeping appeal of the CZBL.

The effects of unfettered third-party appeals to municipally-initiated amendments have also demonstrably impacted private development. Taking the City's CZBL appeal as an example, over the past year Council and Committee of Adjustment schedules have been consistently consumed with applications which but-for third-party appeals would have been able to proceed as-of-right or through a much less extensive minor variance. It would be hard to quantify the number of properties for which the owner simply hasn't advanced development plans because the cost and complexity of a zoning application or minor variance is a deterrent.

Alternatively, should the province remove this proposed provision once again, it is suggested that:

- limited third party appeals for specified persons for new official plans or comprehensive zoning by-laws, as these products are a result of years of effort and extensive community consultation.
- in the case of site-specific OPAs and ZBAs, the preference would be to provide the Ontario Land Tribunal (OLT) with more powers and resources to dismiss appeals without land use planning merit based on the municipal record, and that only the application made and the materials submitted at the time of public meeting be subject of a hearing.

Fee Refund Provisions:

The City is in support of the proposed amendments to the *Planning Act* to repeal the application fee refund requirements introduced through Bill 109, however, the City anticipates staff will likely need to update the current development application processes and the associated fee by-law.

While the City has been successful in meeting the required legislated timeframes for all but one application (where a motion for direction was made to the Tribunal for completeness), the City agrees the intent of the fee refund provisions did not result in the intended positive effect of accelerating the review of development applications.

This will allow municipalities the ability to work with an applicant to make minor changes on a plan or application whereas, with legislative timeframes to approve and refund consequences there were no opportunities to make changes. This may result in slightly longer approval times, but will reduce appeals and refusals.

Repeal of the Mandatory Municipal Pre-Application Process:

The City does not support the proposed amendments to the *Planning Act* to repeal mandatory pre-application consultation before submitting a development application.

Pre-application consultation is an extremely valuable step for all parties and helps set an application up for success. It provides a coordinated touch point for a proposed development concept to be reviewed comprehensively by external agencies and the relevant municipal departments, while providing an opportunity to identify:

- Significant concerns before time and money are spent preparing supporting materials;
- Complete application requirements (i.e. is a full report needed or is a brief acceptable, is a Terms of Reference (TOR) required to be approved before any required reports can be prepared (Traffic Impact Study (TIS), Environmental Impact Study (EIS), etc.));
- The external agencies that will need to be consulted, and their specific development requirements (i.e.. building setbacks to rail lines, berm requirements etc.);
- Whether parkland dedication or cash-in-lieu of parkland dedication will be required, etc.

The City agrees in certain instances it would be appropriate for pre-application consultation to be optional or waived but that this should be determined by the municipality on a case-by-case basis as appropriate. Situations where a municipality ay choose to waive pre-application consultation requirements include:

- Minor site plan applications or amendments (subject to the scope of the application/ amendment);
- Certain type of draft plan of condominium applications;
- Certain minor zoning by-law amendments (i.e. to bring applicable sections of a comprehensive zoning by-law that was appealed in its entirety into force and effect)

The City does not support the proposed amendment allowing applicants to make a motion for direction to have the Tribunal determine whether the information and material have in fact been provided as soon as the required fee under section 69 has been paid. The 30 day timeframe for municipalities to determine completeness is appropriate and is a much shorter timeframe that waiting for a tribunal hearing date. Municipalities need to be provided an opportunity to review the application and determine whether it is complete or not first before a motion for direction is made to the Tribunal. The City believes the amendment to the *Planning Act* as proposed will result in unnecessary motions before the Tribunal (as some applications may in fact be deemed complete).

The City is concerned that the unintended consequences of the cumulative result of this proposed amendment will result in less applicants coming through pre-application consultation, more motions to the Tribunal for direction, additional costs to taxpayers, valuable staffing resources being tied up at the Tribunal (that will take away from other development applications from being able to proceed in a timely manner), and ultimately resulting in homes not being built faster.

Settlement Area Boundary Expansions:

Schedule 12, Sections 4 and 5, of Bill 185 proposes to increase appeal rights for certain matters. Currently, the Planning Act precludes private applications from requesting to amend permitted uses within Protected Major Transit Station Areas; Bill 185 would permit such applications to be made. Similarly, current provisions in the Act prohibit appeals regarding the refusal or lack of decision on official plan amendment and zoning by-law amendment applications that propose to alter the boundary of a settlement area. Bill 185 would allow such appeals on lands outside of the Greenbelt Area.

It is not clear why requests to amend permitted uses within MTSAs should be considered, where Council would not otherwise resolve to consider this change. MTSA decisions approved by the Minister should not be undermined by private applications that could be advanced at any time. It is also not clear why requests to alter the boundary of a settlement area, when not supported by Council, should be considered by the Ontario Land Tribunal. These proposed changes to the Planning Act appear to at cross purposes with the intent of this legislation as well as past Housing Supply Action Plans which are intended to speed up approval processes and cut red tape. These proposed amendments, on the other hand, are likely to result in more time and money spent at the OLT.

The proposed changes are likely to result in sporadic settlement area boundary expansions. Master servicing and infrastructure planning could also be impacted if settlement area boundaries are able to be changed on an individual and on-going basis. Unwelcome settlement area expansions, for which municipalities will have to be responsible for its ongoing servicing, should not be permitted to be referred to the Ontario Land Tribunal for adjudication.

In the Guelph context, private appeals of scattered settlement area boundary expansions or the designation of new settlement areas may complicate the City's existing well-based groundwater systems by introducing potential contaminants which must be managed/monitored. Furthermore, it may lead to additional burdens through the development of new water sources when having to monitor and work with private well owners to ensure we are not impacting their water taking rights. We request that the Province remove the appeal rights for municipal decisions on settlement area boundary expansions as proposed in Bill 185

Standardized Housing Designs:

The proposal is to create regulation-making authority that would enable the establishment of criteria to facilitate planning approvals for standardized housing.

The proposed changes would only apply on certain specified lands, of a minimum lot size, such as urban residential lands with full municipal servicing outside of the Greenbelt Area. The proposal includes the identification of elements of the Planning Act that could be overridden and/or certain planning barriers that could be removed if the criteria are met.

The City would like the opportunity to review and comment on the proposed regulations before they are adopted.

Many municipalities have similar provisions in their respective zoning by-laws with regards to low rise residential zones of up to three units and detached additional dwelling units and these should be considered when drafting the regulations.

When drafting the regulations consideration should also be given to the Ontario Building Code requirements, including spatial separation requirements.

Expedited Approval Process for Community Service Facility Projects:

The proposal is to amend the Planning Act with the intention to create a regulation-making authority to enable a streamlined approvals pathway for prescribed class(es) of "community service facility" projects – community service facilities being defined in the Act as the undertakings of a school board, long-term care homes, and hospitals.

The City recommends that this policy be refined and clarified to avoid impacts related to locating community facilities, ensuring their compatibility and meeting infrastructure needs. The City also notes that broad exemptions to planning standards defeats the purpose of public consultation.

Such exemptions from the Planning Act may impede the City's ability to ensure the Natural Heritage System is protected, enhanced, restored, and expanded as well as and impair the ability to plan and manage current and future infrastructure as improvements to infrastructure may be difficult to secure (e.g. water and wastewater capacity and design).

These exemptions would also impact the City's ability to collect parkland dedication on these sites, further limiting the amount of parkland the City can make available and limit opportunities to work with school boards when locating schools to next to neighbourhood parks for shared open space opportunities.

Municipalities should maintain a primary role in the review of applications for community service facilities within an expedited review process. This would ensure issues are identified and addressed early in the process avoiding costly delays and that community services facilities are well-sited with proper infrastructure available.

Exempting Universities from the Planning Act:

Schedule 12, Section 11 of Bill 185 proposes to add new provisions to the Planning Act that would exempt any undertaking by publicly assisted universities form the Planning Act, except in lands that are within the Greenbelt. The proposed addition to the Act also contemplates regulations associated with this

provision, which seem to be specific to further defining the term “publicly assisted university” for the purpose of this provision. The consultation notice mentions that this authority would exempt university-led student housing projects on- and off-campus.

The City is concerned that exemptions from the Planning Act may impede the City’s ability to ensure the Natural Heritage System is protected, enhanced, restored, and expanded. These exemptions may also impair the ability to plan for future infrastructure as improvements to infrastructure may be difficult to secure (e.g. water and wastewater capacity and design).

Staff are supportive of expediting the development of new student housing if it is undertaken in a coordinated fashion with municipalities. This is a large concern, especially for town and gown communities, as new developments supporting academic institutions can drive unfunded or underfunded community demands, such as dramatically increased municipal transit costs. As currently proposed, projects may also be delayed due to unresolved servicing and planning issues that would have been identified and addressed through the municipal planning process.

Staff would recommend that if exemptions are to be brought forward that they are only for university owned and operated student housing and not for profit student housing, which may be on leased university land.

Closure:

We appreciate the opportunity to provide input and trust that the comments outlined above will be given due consideration. We understand that this response encompasses many substantial proposals - should you have any questions or require additional details please do not hesitate to contact the City at intergovernmental.relations@guelph.ca.

Sincerely,

Krista Walkey, General Manager, Planning and Building Services

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