



AMO's Submission to Review of A Place to Grow and Provincial Policy Statement (ERO 019-6177)

AMO Submission to the Ministry of Municipal Affairs and Housing:

ERO 019-6177

December 22, 2022

Preamble

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that represents municipal governments across Ontario. Together with our members, we address common challenges facing our residents and provide advice to the government about solutions to them. AMO has been actively involved in housing and homelessness advocacy for years, as Ontario's 444 municipal governments are responsible for building strong, complete communities, of which housing – both home ownership and rentals – is a key component.

Housing affordability and building supply is a challenge all Ontarians share. There is much that can be done collectively by working together to increase housing supply, diversify the mix and increase affordability. Solving the housing crisis will require an all-of-government approach by all three orders of government and the development industry.

Introduction

AMO appreciates the opportunity to provide comments on the remaining 2022 consultations related to Bill 23 – *More Homes Built Faster Act, 2022*, and the latest Housing Supply Action Plan: *More Homes Built Faster*. This submission complements prior comments made on [November 24](#), [December 2](#), and [December 9](#).

Since 2018, the province has introduced three Housing Supply Action Plans and passed several omnibus-style bills to address housing supply. These changes, combined with the introduction and extension of strong mayors this year, have forced municipal governments to adapt quickly, despite having some key dates and details outstanding.

The province has created a generational shift in planning and seems to place the onus directly on municipal governments to build housing faster. At the same time, many of the key tools that municipalities had to recover costs associated with growth and responsibly manage livability and environmental considerations have been removed. The unintended consequences of these changes cannot be understated and have been documented by many municipal governments and environmental groups through individual comments. AMO encourages the government to review these submissions carefully.

AMO wants to help solve housing supply and affordability crisis in Ontario, as our members see the impacts of housing affordability and homelessness every day. We are doing our part but need the province to engage with municipal governments in a meaningful way going forward. In particular, the successful implementation of Bill 109 and Bill 23 is a priority for the sector, as it is critical to the success of the province's goal to build 1.5 million homes by 2031.

In 2023, AMO will be looking for clarity and certainty on the new rules, and a renewed focus on how the entire system can be improved, including the province itself and the development industry. We all need to work together to build housing for all Ontarians.

Review of A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Provincial Policy Statement (ERO 019-6177)

AMO appreciates the province's effort to undertake a housing-focused review and consider integrating the "A Place to Grow: Growth Plan for the Greater Golden Horseshoe" (Growth Plan) and the Provincial Policy Statement (PPS). At this time, AMO is providing high-level comments as it is difficult to fully evaluate the potential impacts of these proposed changes until the details of what a consolidated document would look like are known.

AMO is supportive of reducing duplication, removing potentially conflicting policy directions, and providing clarity on matters of provincial interest. AMO is, however, concerned that sweeping changes to the land use planning policy system could cause significant and unintended consequences.

A strong and effective planning policy framework is the foundation of effective decision-making at the municipal level. We are concerned that a single province-wide policy framework may not be able to provide sufficient direction on coordinated, fiscally sustainable growth and the appropriate protection of resources across significantly different local contexts. Inclusive and meaningful consultation with municipalities across the province will be critical to achieving this balance.

The recent pace and scale of changes to Provincial planning legislation and policy has made it difficult for municipalities, regardless of size, tier, or geography to manage. Substantially revising provincial direction will impact all Greater Golden Horseshoe (GGH) upper-tier, single-tier, and most lower-tier municipalities that have completed or are in the process of completing a Municipal Comprehensive Review (MCR), with significant potential for delays. An alternative approach could be to make precise and targeted changes that support our shared goal of building more homes faster, without further exacerbating uncertainty.

In the meantime, consideration must be given to what data would be used, how it would be sourced, and how long-term population forecasts would be established and monitored for single, upper- and lower-tier municipalities in a consolidated provincial planning policy instrument. For example, the application of a standardized provincial Land Needs Assessment (LNA) / Provincial Projection Methodology Guidelines (PPMG) methodology for all Ontario municipalities should be explored. The LNA Guidelines were updated in 2020, and currently apply to GGH municipalities, while all other Ontario municipalities rely on the 1995 PPMG for simplified guidance regarding the technical approach to growth forecasts and urban land need assessments.

Similar concerns would apply to the Residential Intensification Targets, Minimum Density Requirements, Rural Settlement Areas, and Employment Area Conversion policies currently contained in the Growth Plan and PPS.

That is why AMO strongly encourages the province to read individual submissions from municipalities that have provided specific input on the questions asked in the ERO posting. A comprehensive and meaningful consultation process with municipalities and other stakeholders should be conducted in 2023 to discuss in more detail what the core elements and other proposals will mean on the ground. The process of integrating these documents must be coordinated and measured, as otherwise the level of detail and direction provided in these documents could be eliminated in the short-term, at the expense of good planning in the long-term.



Conclusion

On behalf of municipal governments across Ontario, thank you for your consideration of the comments provided in this submission on the More Homes for Everyone Plan. As we head into 2023, AMO strongly encourages the province to work with municipalities in a meaningful way to help ensure there is a coordinated and effective effort by all parties to not only reach its housing supply goal of building 1.5 million homes by 2031, but work on developing solutions across the entire housing continuum.