

May 8, 2023

Hon. Doug Ford, Premier of Ontario
Hon. Steve Clark, Minister of Municipal Affairs and Housing
Legislative Building
1 Queen's Park
Toronto, Ontario
M7A 1A1

Re: Making Room for Greater Growth and Prosperity on Ontario: Planning Leadership Response to Proposed Provincial Planning/Policy Statement and Related Considerations (ERO Posting Number 019-6813).

Dear Premier Ford and Minister Clark:

As retired Chief Planning Officials, and former Chairs, Vice-Chairs and members of the Regional Planning Commissioners of Ontario (RPCO), we are pleased to make this submission (this letter and the attached Detailed Submission) regarding your draft Provincial Planning/Policy Statement (PPS) and related considerations. We are passionate about our Province, and are most interested in the legacy that your Government's decisions will leave for millions of Ontarians both today and for generations to come.

We appreciate that you are taking Ontario's housing needs seriously. With a target of 1.5 million new homes over the next ten years, you have acknowledged the need to plan for large growth levels. More specifically, you have recognized the additional impact of increased immigration levels, which are expected to affect the Provinces of Ontario and British Columbia the most.

The signatories to this letter possess decades of planning and development experience. We have seen many big societal changes, some of which were shaped by sound legislation and thoughtful implementation plans. You have made a number of decisions that we support, as noted in this submission. We believe that other decisions you have made have had unintended consequences, but can be mitigated if your Government is willing to undertake some prudent course corrections now.

In our opinion, replacing the existing Provincial *Places to Grow* (Growth Plan) and the *Provincial Policy Statement* with a new Provincial Policy Statement will do little to adequately address Ontario's housing problems. In fact, it could make things worse, as we describe below.

If indeed the PPS is to be an expression of the Province's interests in land use planning, with housing at the forefront, it needs to clearly enunciate initiatives to make it happen. This must include anchoring a commitment to building a variety of housing affordability types in the new PPS, in addition to other implementation tools like Municipal Official Plans and Zoning By-laws. Allowing more (higher density) intensification as-of-right near transit stations and in transit corridors would also be helpful. We are collectively faced with a largely financial problem and not a planning problem.

Accordingly, we recommend the following actions be taken now by your Government as it pertains to the content of any new PPS and for equally or more important related actions of your Government:

Action 1 – Directly address the most compelling housing need in Ontario today – affordability. Issues such as further increasing housing supply and efficient development review are secondary to the most important challenge for Ontarians. People cannot afford the variety of housing types currently available, especially for lower income households. Again, anchor such a requirement in any new PPS.

Action 2 – Establish or re-establish a sustainable municipal financing model to ensure infrastructure can be fully financed (not on the backs of property taxpayers) and be built in a timely manner. Your actions to provide discounts and exemptions for municipal development-related fees are working against your Government’s desire to accelerate housing production. What’s more, these discounts are not required to be passed on to home buyers. Simply put, without infrastructure, there is no housing, including lower-cost housing.

Action 3 – Complete your assessment of the Natural Heritage System (as it pertains to Southern Ontario) and establish other protective environmental approaches for the north in the new PPS, all in the interests of natural areas conservation. Do not permit any further housing development in significant natural areas, including the Greenbelt, and on agricultural lands throughout Ontario that support or could support stronger domestic supply chain commodity production, especially food for Ontarians. There are ample opportunities for new development within existing urban boundaries, including sizable intensification potential. Land supply is not the problem.

Action 4 – Ensure compact and sustainable development, using existing infrastructure (including transit), is your government’s primary strategy for accommodating growth well into the future, and not just “... where locally appropriate.” We do appreciate and support your previous decision to allow intensification as-of-right as a component of such a strategy. The creation of compact and sustainable communities will not only offer more affordable forms of housing, it will lead to more resilient communities that can better withstand the effects of Climate Change.

Action 5 - Be truly innovative. Create new partnerships with the housing industry and all levels of government to build affordable housing in much larger quantities; consider funding models and marketing programs that can promote the widescale development of accessory dwelling units in existing low density neighbourhoods; create sustainable communities that are more robust in design to withstand Climate Change; support new building materials and techniques, including the use of greener and more climate-resilient materials; unlock suitable publicly owned land for new housing at much larger scales and much more quickly than in the past; find ways to allow smaller home builders easier access into the market; support programs that further facilitate industrialized housing built in factories and assembled on site; establish new funding models involving all government levels that create affordable housing and keep it affordable; explore new ways to enable municipalities to access different revenue sources; recognize the important connection between affordable mobility, affordable food and affordable housing, and introduce programs that integrate these fundamentals of affordable living.

We urge you to focus your efforts on the core housing problem in Ontario today; creating quality, sustainable, long term affordable housing of all types and tenures in large volume for near term occupancy. We see the lack of lower cost housing not as a planning problem, but a financial one.

This is a time in the Province’s history where an enormous investment in building many types of affordable housing is required. Stewarding the public interest is both an immense privilege and a

responsibility. Please ensure that your actions are supporting all Ontarians today and tomorrow. We trust these comments are a helpful contribution.

Sincerely,

John Fleming, MCIP, Retired Managing Director of Planning and Chief Planner (City of London), and former RPCO Vice-Chair.

Alex Georgieff, MCIP, RPP (Lifetime), Retired Commissioner of Planning and Economic Development (Durham Region) and former RPCO Chair.

Ron Glenn, MCIP, RPP, Retired Chief Planner and Director of Planning (Halton Region) and former RPCO Chair.

Samantha Hastings, Retired Commissioner of Community and Planning Services (District of Muskoka).

Rob Horne, MCIP, RPP, Retired Planning Commissioner (Waterloo Region), Retired CAO and former RPCO Chair.

Bill Lautenbach, Retired Planning Commissioner (Greater Sudbury) and former RPCO Vice-Chair.

Nick Tunnacliffe, FCIP, Retired Planning Commissioner (Ottawa and Peel Regions) and former RPCO Chair.

Cc

Mr. Thom Hunt, Current Chair, RPCO
RPCO Member Municipalities
Association of Municipalities of Ontario
Ontario Professional Planners Institute

Please direct inquiries to Rob Horne at rjhorne03@gmail.com.

Detailed Submission

***Making Room for Greater Growth and Prosperity on Ontario:
Planning Leadership Response to Proposed Provincial Planning Statement and Related
Considerations (ERO Posting Number 019-6813).***

Prepared by:

**Alumni Municipal Chief Planning Officials and Past Chairs and Vice-Chairs of the
Regional Planning Commissioners of Ontario.**

May 8, 2023

As retired Chief Planning Officials and former Chairs, Vice-Chairs and members of the Regional Planning Commissioners of Ontario (RPCO), we are pleased to make this submission regarding your draft Provincial Planning/Policy Statement (PPS) and related considerations. We are passionate about our Province, and are most interested in the legacy that your government's decisions will leave for millions of Ontarians both today and for generations to come.

We appreciate that you are taking Ontario's housing needs seriously. With a target of 1.5 million new homes over the next ten years, you have acknowledged the need to plan for large growth levels. You have particularly recognized additional housing demands from increased immigration levels, which are expected to affect the Provinces of Ontario and British Columbia the most.

The signatories to this submission possess decades of planning and development experience. We have seen many big societal changes, some of which were shaped by sound legislation and thoughtful implementation plans. Your Government has made a number of decisions that we support, as noted in this submission. Other decisions you have made have had unintended consequences, but can be mitigated if your government is willing to undertake some prudent course corrections now.

We believe that the Vision included in the proposed PPS is mis-aligned with the rest of content of the document in its current form.

A. Using Three Pillars to Understand Housing Opportunities and Challenges

There are any number of ways to look at housing issues. We have chosen to simply use three pillars of Ontario's housing challenges, namely environment; planning and implementation; and financing.

1. Environment

The environment has natural, socio-cultural and economic elements. Among many things, the natural environment gives us green infrastructure that does not need to be built or maintained, only protected. The establishment of the Greenbelt, a 2 million acre environmental and agricultural reserve, was a remarkable accomplishment. Not only is it important to Ontarians today for a variety of functions (including the protection of our invaluable water resources), but it stands to be even more critical as the Province grows. The Greenbelt is a vital part of Ontario's "food basket". Complete your assessment of the Natural Heritage System (as it pertains to Southern Ontario) and establish other protective environmental approaches for the north in the new PPS, all in the interests of significant natural areas conservation.

We are unclear as to why site plan control is being removed for smaller-sized development. There are unintended consequences, such as situations where development is adjacent to shorelines and other sensitive natural features. We are also unclear as to why watershed-based planning is being significantly compromised by the Province, including Conservation Authority roles.

Socio-culturally, people must be willing and able to purchase and finance or rent housing built in Ontario to suit their unique needs (including multi-generational households). **The most important point that we can make to you in this submission is that no matter how we view the housing crisis in Ontario, it is one of affordability. Solutions must include housing accessible to the "missing middle" and housing for people who simply cannot afford open market homes at prices being asked today. Not only must housing be affordable from initial occupancy, but it must remain affordable for long periods of time.** Government needs to be innovative. Consider alternative tools for widespread application, like Community Land Trusts.

It also remains unclear to us as to why municipal Official Plans, the municipal planning process itself (directed by the Province's own *Planning Act*) and *Ten Year Housing and Homelessness Plans* are dealt with separately. This appears to be an unhelpful and siloed approach to systematic problem-solving. Actions to further harmonize these documents would be helpful.

We also see a vital link between housing and health care. Your government has signalled its interest in helping people stay in their homes instead of being institutionalized. We encourage you to strengthen that link with additional financial incentives (e.g. forgivable loans) or relief (e.g. through tax reform) in the interests of such home support. More broadly, our communities

are seeing unprecedented demands for mental health and other social supports that are not being fully addressed. Available open spaces should also be seen as essential supports for personal well-being of Ontarians in all communities.

Economically, the environment is incredibly challenging for Ontarians today, especially as we navigate record levels of inflation. While we are now seeing signs of a more sustainable recovery from the Pandemic, the weakness of our domestic supply chains is unmistakable, especially for food. We urge you to limit the development of agricultural lands for housing (especially section 4.3 of the draft PPS).

We are particularly concerned that Section 4.3.3.1(a(2)), which allows for residential lot creation on prime agricultural lands. Each existing lot could be divided into three new lots. This is a major departure from Ontario's long-standing policy efforts to protect and consolidate agricultural parcel sizes to maintain and expand agricultural productivity over the long term. This policy stands to promote the fragmentation of Ontario's prime agricultural lands, while having no real impact on creating housing affordability. It is working against our collective well-being, and the need to instead strengthen domestic commodity production in all sectors.

Finally, we appreciate that the development/home building industry works in an open market system of supply and demand dynamics. Accordingly, developments will not be built that do not provide an overall positive return on investment (i.e. a profit). There is nothing "wrong" with this open market dynamic; however, on its own, it will not create the full spectrum of desperately needed affordable housing types. Accordingly, there must be better tools in place that involve government at all levels to bridge the financial gap, but to do so in such a way that all required housing affordability types are built of a high quality, in large volume, in much shorter periods of time, and in a form that will remain affordable well into the future. Home builders know how to build. Better public-private partnerships need to be devised and implemented now for all municipalities. Your *Housing Supply Action Plan Implementation Team* represents a good step. However, your go-forward implementation strategy must be founded on real-world project management planning, including sustainable and replicable (financial) pro formas.

2. Planning and Implementation

Good planning must continue to be a cornerstone of the Province's economic development strategy. Today, people (human capital) are more footloose than ever. Finding high quality living choices through the development of complete communities is even more important to attract and retain such human capital. In this respect, we commend your Government for continuing to support greater densities along existing and future transit routes, and for investing in public transit across the Province. We feel this is important to recognize that affordable living includes affordable housing, which should be located close to affordable forms of transportation (both where available and where they can be established). We would,

however, like to see a greater commitment to compact development (including many forms of intensification) in the final PPS over continued urban expansion (i.e. sprawl). We know that many other Ontarians will make the same request in their submissions.

Supporting more efficient and effective development review is a good step. There is always room for improvement. Under the *Streamlining Development Approvals Fund*, municipalities have been able to make improvements to their review systems. Such improvements will also rely on applicants being efficient and responsive. We would encourage you to continue this Fund into the future. We would also encourage you to initiate a fulsome review of the efficiency and effectiveness of development review roles by your many Ministries, agencies and other Provincial entities, especially as they might affect municipal deadlines for decision-making by local Councils. We also believe the same exercise would benefit Federal Departments and agencies.

We applaud your as-of-right provisions to support the creation of many more accessory units. However, what we see missing are practical ways to help households to achieve the creation of up to three new units. For most, navigating Building and Fire Code requirements can be a daunting process. Resources need to be dedicated to help them, like on-line support services with access to real people (not just generic guidebooks), and hands-on support from municipal officials. Building safe and well-designed accessory units (in form and function) is critical but achievable.

We urge you to revisit the importance of parkland in realizing complete communities and to support a high quality of life for Ontarians in their own neighbourhoods. People need ample, accessible and multi-purpose open spaces to support their personal well-being. Protecting and integrating green infrastructure is elemental to building sustainable, livable communities.

Finally, we appreciate your Government's subsequent amendments to the original draft legislation (i.e. Bill 23) that would have reduced the natural justice rights of Ontarians at the Ontario Land Tribunal. However, the use of Minister's Zoning Orders and other unilateral Ministerial/Government tools to make decisions (absent public participation and natural justice rights) remains troubling. Participatory democracy has always been a cornerstone of good land use planning in Ontario. If new efficiencies are being sought, they might be realized through reviewing the structure and process of appeal bodies themselves, better application of informing and engaging technologies, and undertaking other critical path reviews.

3. *Financing*

There are two aspects of financing that either drive or impede housing production. The first is the ability of households to own or rent their homes. Interest rates, equity positions, and household income levels are but a few examples of the big housing levers that lie outside of the control of the Province. Your government has rightly acknowledged these and other levers that

could well impede your ability to reach your lofty housing target. They are the big determinants of housing activity.

The second financing aspect is the ability of public entities, especially municipalities, to build infrastructure in the wide variety of communities across Ontario (e.g. northerly or southerly, urban or rural, large or small). Many years ago, the *Development Charges Act* was put in place by the Province (with appeal provisions) to ensure that municipalities only collected fees from new development that supported growth-related net capital costs. Most recently, your government has put discounts and exemptions in place for a variety of housing types. The outcome is both counter to your goal of facilitating development, and is unsustainable. We have already seen municipalities defer infrastructure decisions due to a lack of financial resources. To your credit, the Province has acknowledged the potential shortfalls and has committed to consider making some cities whole. However, the choices right now for municipalities (through elected Councils) are two-fold; either don't build the infrastructure, or place these financial shortfalls on the backs of existing property taxpayers. **This problem exists throughout Ontario, and not only in large cities, and we seriously question the principle of fairness of placing financial growth demands on existing property taxpayers. To make matters worse, most Ontarians are also struggling with basic housing affordability and dramatic grocery price inflation.**

In summary, the lack of lower cost housing is not a planning problem, it is a financial problem.

B. Additional Related Considerations

We appreciate other actions that your government has taken in support of new housing creation. Better anchoring the skilled trades in secondary school curricula and facilitating immigration programs to bring skilled trades to Ontario (i.e. *Ontario's Express Entry Skilled Trades Stream*) are commendable steps.

Leveraging new resources through programs supporting equity, diversity and inclusion is essential. Engagement with First Nations is critical.

As you know, the Federal government recently announced a \$4 billion *Housing Accelerator Fund*. What better time to apply for these funds to design and implement housing prototypes that could give the Province and municipalities a series of templates that support building a range of affordability types at big scales and in much shorter occupancy periods?

Finally, a more targeted and different approach to municipal development charge reductions or incentives should be explored. We would strongly recommend a much narrower and more targeted approach of reductions and exemptions only for "deeply" affordable housing types over longer periods of time (e.g. units must stay affordable for a substantial number of years). It should be recognized that sprawl development represents a very costly form of housing that

hurts housing affordability overall, increasing pressures on municipalities and their tax base for new services. Any development-related fee reductions and exemptions should be directed toward incenting forms of housing intensification in existing built-up areas.

As it is, development charge reductions and exemptions will preclude development unless municipalities are made financially whole by your government through “bankable commitments”. **The loss of infrastructure investment funds collected by municipalities is already estimated to be a billion dollars annually over the next ten years (per AMO). Housing cannot be built without infrastructure.**

C. Key Actions Requested of your Government

In our opinion, replacing the existing Provincial *Places to Grow* (Growth Plan) and the *Provincial Policy Statement* with a new Provincial Policy Statement will do little to adequately address Ontario’s housing problems. In fact, it could make things worse.

If indeed the PPS is to be an expression of the Province’s interests in land use planning, with housing at the forefront, it needs to clearly enunciate initiatives to make it happen. This must include anchoring a commitment to building a variety of housing affordability types in any new PPS, in addition to other implementation tools like Municipal Official Plans. Allowing more (higher density) intensification as-of-right near transit stations and in transit corridors would also be helpful.

Accordingly, we recommend the following actions be taken now by your Government as it pertains to the content of any new PPS and for equally or more important related actions of your Government:

Action 1 – Directly address the most compelling housing need in Ontario today – affordability. Issues such as further increasing housing supply and efficient development review are secondary to the most important challenge for Ontarians. People cannot afford the variety of housing types currently available, especially for lower income households. Again, anchor such a requirement in any new PPS.

Action 2 – Establish or re-establish a sustainable municipal financing model to ensure infrastructure can be fully financed (not on the backs of property taxpayers) and be built in a timely manner. Your actions to provide discounts and exemptions for municipal development-related fees are working against your Government’s desire to accelerate housing production. What’s more, these discounts are not required to be passed on to home buyers. Simply put, without infrastructure, there is no housing, including lower-cost housing.

Action 3 – Complete your assessment of the Natural Heritage System (as it pertains to Southern Ontario) and establish other protective environmental approaches for the north in the new PPS, all in the interests of natural areas conservation. Do not permit any further

housing development in significant natural areas, including the Greenbelt, and on agricultural lands throughout Ontario that support or could support stronger domestic supply chain commodity production, especially food for Ontarians. There are ample opportunities for new development within existing urban boundaries, including sizable intensification potential. Land supply is not the problem.

Action 4 – Ensure compact and sustainable development, using existing infrastructure (including transit), is your government’s primary strategy for accommodating growth well into the future, and not just “... where locally appropriate.” We do appreciate and support your previous decision to allow intensification as-of-right as a component of such a strategy. The creation of compact and sustainable communities will not only offer more affordable forms of housing, but it will also lead to more resilient communities that can withstand the effects of Climate Change.

Action 5 - Be truly innovative. Create new partnerships with the housing industry and all levels of government to build affordable housing in much larger quantities; consider funding models and marketing programs that can promote the widescale development of accessory dwelling units in existing low density neighbourhoods; create sustainable communities that are more robust in design to withstand Climate Change; support new building materials and techniques, including the use of greener and more climate-resilient materials; unlock suitable publicly owned land for new housing at much larger scales and much more quickly than in the past; find ways to allow smaller home builders easier access into the market; support programs that further facilitate industrialized housing built in factories and assembled on site; establish new funding models involving all government levels that create affordable housing and keep it affordable; explore new ways to enable municipalities to access different revenue sources; recognize the important connection between affordable mobility, affordable food and affordable housing, and introduce programs that integrate these fundamentals of affordable living.

D. A Closing Note

The signatories to this submission possess decades of planning and development experience. We have seen many big societal changes, some of which were shaped by sound legislation and thoughtful implementation plans. You have made a number of decisions that we support, as noted in this submission. Other decisions you have made have had unintended consequences, but can be mitigated if your government undertakes some prudent course corrections now.

We urge you to focus your efforts on the core housing problem in Ontario today; creating quality, sustainable, long term affordable housing of all types and tenures in large volume for

near term occupancy. We see the lack of lower cost housing not as a planning problem, but a financial one.

This is a time in the Province's history where an enormous investment in building many types of affordable housing is required. Stewarding the public interest is both an immense privilege and a responsibility. Please ensure that your actions are supporting all Ontarians today and tomorrow. We trust these comments are a helpful contribution.

Sincerely,

John Fleming, MCIP, Retired Managing Director of Planning and Chief Planner (City of London) and former RPCO Vice Chair.

Alex Georgieff, MCIP, RPP (Lifetime), Retired Commissioner of Planning and Economic Development (Durham Region) and former RPCO Chair.

Ron Glenn, MCIP, RPP, Retired Chief Planner and Director of Planning (Halton Region) and former RPCO Chair.

Samantha Hastings, Retired Commissioner of Planning and Community Services (District of Muskoka).

Rob Horne, MCIP, RPP, Retired Planning Commissioner (Waterloo Region), Retired CAO and former RPCO Chair.

Bill Lautenbach, Retired Planning Commissioner (Greater Sudbury) and former RPCO Vice-Chair.

Nick Tunnacliffe, FCIP, Retired Planning Commissioner (Ottawa and Peel Regions) and former RPCO Chair.

Please direct inquiries to Rob Horne at rjhorne03@gmail.com.