



August 4, 2023

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto ON, M7A 2J3

Re: ERO # 019-6813

General Questions and Comments:

- Is a Land Needs Assessment required anymore for settlement boundary expansion?
- What is the timeline for municipalities to update their Official Plans to be consistent with the PPS? Would the Ministry consider requiring the Municipalities to undertake a conformity exercise earlier than the typical timeline required under the Act?
- The PPS does not provide direction related to urban design and built form compatibility issues. These can often present a significant barrier to development proceeding at the speed and densities required to address the housing supply crisis. Would the Ministry consider providing specific direction through the PPS limiting the ability of Municipalities to require Noise and Shadow studies or employ Angular Planes to reduce the scale of a development?
- There is a need for more extensive use of pre-zoned lands that should be addressed through the PPS to avoid a costly, unnecessary, and lengthy development application and approvals process. It needs to be recognized that current Municipal Zoning By-laws under zone densities.
- The province has established a valuable goal of facilitating the construction of 1.5 million homes over 10 years to help provide housing to our growing population. The proposed revisions to the PPS and the revised legislation implemented through Bill 108, Bill 109, Bill 23, and Bill 97 are a positive step in the right direction. The province is encouraged to help facilitate a greater mix of uses in all areas through the reduction of barriers such as those noted above.

Chapter 1: Introduction

- (Page 1) Zoning and development permit by-laws are also important for the implementation of this Policy Statement. Zoning and development permit by-laws should be forward-looking and facilitate opportunities for an appropriate range and mix of housing options for all Ontarians.
 - Comment: What happens when municipalities aren't adhering to the PPS? Forward looking should include as-of-right permissions to avoid the lengthy development application process. This will ensure timely construction of res. units and an adequate supply at a reasonable price. Many municipalities in Ontario do not bring their zoning by-laws into conformity with their OP at all, or within the prescribed 3-year timeline. What recourse is there in this scenario? We need to promote shovel-ready projects. More needs to be done as well to ensure that there is necessary sanitary servicing infrastructure in place to support 1.5 million homes including funding from the Province and Federal governments.



Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

- (2.1, 1) At the time of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 25 years, informed by provincial guidance.
 - Comment: How do we define ‘available’?
- (2.2, 2b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.
 - Comment: Allocation is one of the biggest bottlenecks in progressing new developments. DCs collected by municipalities must be planned/managed better for effective construction of capital infrastructure. We suggest revising to a 5-year supply of res units.
 - Comment: After ‘suitably zoned’, add ‘with Planning approvals for site plans or registered plans for subdivisions.’ The suggestion is to have a 5-year supply of res. units always available to go to go to market/pull permits.
- (2.2, c) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of *active transportation*; and
 - Comment: How does this overcome NIMBYism/council sending files to the OLT?
- (2.3, 4a) In identifying a new *settlement area* or allowing a *settlement area* boundary expansion, planning authorities should consider the following:
 - a) that there is sufficient capacity in existing or planned *infrastructure* and *public service facilities*;
 - Comment: Settlement areas should also consider areas where services can be easily provided or front ended by landowners to introduce more land within the urban boundary. If several landowners are willing to front end the necessary infrastructure to accommodate complete communities, they should be able to create a settlement area. Developers occupying large parcels in the same block can create master planned communities unlike any other infill/redevelopment site that does not have adequate parkland or servicing allocation.
- (2.4, 1a) identifying an appropriate minimum density target for each strategic growth area; and
 - Comment: What is appropriate? Is there a mechanism for arguing what is appropriate once a municipality makes a decision?
- (2.4.2, 1) *Large and fast-growing municipalities* shall delineate the boundaries of *major transit station areas* on *higher order transit* corridors through a new official plan or official plan amendment adopted under section 26 of the *Planning Act*. The delineation shall define an area within a 500 to 800 metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.
 - Comment: MTSA boundaries should be considered on a site-by-site basis. It is inefficient to draw an 800m radius around each station. Delete the radius and just keep walking



distance. Different radii can still provides a 10 min walk to the station depending on the road pattern.

- Comment: Proximity to 400 series highways, walkable to hospitals, major sources of employment etc. and other essential infrastructure should be captured in a similar strategic growth area and have similar density targets.
- (2.4.2, 6) All *major transit station areas* should be planned and designed to be *transit-supportive* and to achieve *multimodal* access to stations and connections to nearby *major trip generators* by providing, where feasible:
 - Comment: Transit supportive and/or complete communities.
- (2.6,1c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate *sewage and water services*
 - Comment: Make certain it's clear and encouraged that if developers are willing to front-end services, it can promote more development.
- (2.8) Employment Areas
 - Comment: Further support for the inclusion of employment throughout the Province intermixed with residential uses to encourage stronger mixed-use communities will encourage alternative forms of transportation and reduce the need to travel long distances to get to and from work.

Chapter 3: Infrastructure and Facilities

- (3.1, 6) Planning authorities, in consultation with school boards, should consider and encourage innovative approaches in the design of schools and associated child care facilities, such as schools integrated in high-rise developments, in *strategic growth areas*, and other areas with a *compact built form*.
 - Comment: If a developer agree to design ground floor institutional space around a school, they should be able to apply for additional density without density bonusing. Likewise, maybe exempt from CBC or EDCs.
 - Comment: Can developers rent the space to the school? Does it have to be a sale?
- (3.6, 1) accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing *municipal sewage services* and *municipal water services* and existing *private communal sewage services* and *private communal water services*;
 - Comment: Maybe for a longer period. Half the battle in hitting these new housing targets is allocation/capacity issues. Reminder that infrastructure needs to be planned for at least 25 years in advance. 2.1 1&2.
- (3.6, 7) Planning authorities may allow lot creation where there is confirmation of sufficient *reserve sewage system capacity* and *reserve water system capacity*.
 - Comment: Lot creation and draft plan approval should not be related to servicing allocation. This ensures timely delivery of the project and allows planning approvals to move in sync with Engineering milestones. Maybe registration of subdivision or site plan approval should be where this is captured.



Chapter 4: Wise Use and Management of Resources

- (4.6, 3) Planning authorities shall not permit *development* and *site alteration* on *adjacent lands* to *protected heritage property* unless the *heritage attributes* of the *protected heritage property* will be *conserved*.
 - Comment: Why not?

Definitions

- **Complete communities:** means places such as mixed-use neighbourhoods or other areas within cities, towns, and *settlement areas* that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, *public service facilities*, local stores and services. *Complete communities* are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.
 - Comment: Shall include highways and interchanges as options. Also, proximity to essential infrastructure such as hospitals, child care centers etc. Drivability should also be considered.
- **Designated and available:** means lands designated in the official plan for urban residential use. For municipalities where more detailed official plan policies (e.g. secondary plans) are required before development applications can be considered for approval, only lands that have commenced the more detailed planning process are considered to be *designated and available* for the purposes of this definition.
 - Comment: Revise to ‘completed’ rather than ‘commenced’. Leaving as commenced will show an inflated # of available units due to the planning process. Municipalities will be able to point towards having more designated and available units than in fact exists once all planning approvals are completed.
- **Higher order transit:** means transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit. *Higher order transit* can include heavy rail (such as subways, elevated or surface rail, and commuter or regional inter-city rail), light rail, and buses in dedicated rights-of-way.
 - Comment: Major highways and interchanges should also be included.
- **Housing options:** means a range of housing types such as, but not limited to single detached, semi-detached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, laneway housing, garden suites, rooming houses, multi-residential buildings, including low- and mid-rise apartments. The term can also refer to a variety of housing arrangements and forms such as, but not limited to, life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community homes, *additional needs housing*, multi-generational housing, student housing, farm worker housing, culturally



- appropriate housing, supportive, community and transitional housing and housing related to employment, educational, or *institutional uses*, such as long-term care homes.
 - Comment: Why not high-rise apartments?

Appendix – Schedule of Large and Fast Growing Municipalities

- Comment: Add Innisfil, Bradford West Gwillimbury, Halton Hills, and New Tecumseth. These municipalities are anticipated to experience rapid growth.
- Comment: This list should accommodate municipalities with significant population growth projections.