



Greater Ottawa Home Builders' Association
Association des constructeurs d'habitations d'Ottawa

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Minister Paul Calandra
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

RE: Comments on ERO #019-8273

Please accept the below from the Greater Ottawa Home Builders' Association (GOHBA) and its members as a submission to the government's request for feedback on the *Get It Done Act, 2024* and Amendments to the *Official Plan Adjustments Act, 2023* (ERO #019-8273).

This submission follows on and complements a number of GOHBA's previous submissions:

- ERO 019-7885 - Planning Statute Law Amendment Act, 2023
- ERO 019-6821 - Proposed Planning Act, City of Toronto Act, 2006, and Ministry of Municipal Affairs and Housing Act Changes (Schedules 2, 4, and 6 of Bill 97 - the proposed Helping Homebuyers, Protecting Tenants Act , 2023)
- ERO 019-6813 - Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument
- ERO 019-6177 - Review of A Place to Grow and Provincial Policy Statement
- ERO 019-6163 - Proposed Planning Act and City of Toronto Act Changes (Schedules 9 and 1 of Bill 23 - the proposed More Homes Built Faster Act, 2022)
- ERO 019-4968 - City of Ottawa Approval of a municipality's official plan

Specific Changes to Ottawa's Official Plan

As per our comments on the Planning Statute Law Amendment Act (ERO #019-7885), GOHBA fully supports the retention of the province's revision of permissible heights to Minor Corridors in Ottawa's Official Plan.

We note that at its November 22, 2023 meeting, Ottawa City Council also requested that the province "retain Minor Corridor permissible heights in accordance with the November 2022 Ministry approval of the City's new Official Plan."

We are very pleased to see this reflected in Schedule 3:

*8. Official plan adopted by the City of Ottawa pursuant to By-law 2021-386
November 4, 2022
Modifications numbered 7, 8, 9, 10, 12 and 13*

More flexible building height regulations will facilitate better urban development and will help to address Ottawa's housing goals, especially when it comes to intensification.

Ottawa's Official Plan Does Not Provide Sufficient Housing for its Growing Population

Despite the above, GOHBA is extremely concerned that Ottawa's residents will continue to face a significant housing shortage over the next twenty years due to deliberate decision-making in the development of its Official Plan.

The current Official Plan solidifies a structural housing deficit for Ottawa by under-estimating its population growth, over-estimating its potential for intensification, and therefore artificially limiting its urban expansion needs.

We provide a detailed timeline of these decisions in the enclosed Appendix A, but the ultimate result is a structural housing deficit for Ottawa:

- Ottawa's Official Plan is built on a population growth of 400,000 new residents to 2046.
- The Ministry of Finance's latest population projections (July 2023) forecasts growth of 650,000 people to 2046.
- Ottawa's Official Plan targets 195,000 new homes by 2046 to accommodate its planned 400,000 new residents.
- Based on updated projections, the City of Ottawa will require 242,000 new residential units to accommodate population growth to 2046.
- That's a **deficit of 47,000 homes** over the next 22 years compared to what the City is planning for currently.

This deliberate decision-making has already manifested itself in the City's recent decision to under-zone Protected Major Transit Station Areas (PMTSAs), which was required through Bill 23.

Ottawa's Failure to Increase Intensification around Transit Stations

In November 2023 the City chose to decline the opportunity to increase zoning heights around transit stations. Instead, the City decided to ensure that only minimum densities were confirmed for PMTSAs, as opposed to proactive zoning to help fulfill its municipal housing pledge of 151,000 new homes over the next decade.

This was a wasted opportunity to be ambitious in its city-planning, to properly plan municipal infrastructure for land supply adjacent to rapid transit and to ensure built-in ridership for its LRT system.

GOHBA also believes that the City has failed to implement zoning in support of PMTSAs as directed by the Planning Act.

It is critical to note that PMTSAs are also where the Official Plan conceives that most high-density multi-family buildings will be located. It's supposed to be where the most affordable housing moving forward will be offered in the city - 1, 2 and 3 bedroom apartments that are close to a transit.

Achieving the City's intensification targets will require an ambitious zoning bylaw that is updated in a timely manner. The lack of proper zoning for PMTSAs will contribute to a shortfall of homes that the new Official Plan is counting on for Ottawa's residents.

Ensuring Municipal Official Plans Align with Provincial Policy

As stated in our previous submissions, GOHBA has a number of recommendations to ensure official plans for municipalities across the province align with provincial policies and support housing affordability and supply for their residents, both now and into the future.

This would provide mechanisms for the MMAH to ensure that the projections of the provincial Growth Plan are being met locally, not only from a population forecast projection perspective but also from a market needs assessment of the type of housing that will be required to accommodate future housing needs:

- Growth projection methodologies undertaken by municipalities need to be scrutinized by the MMAH early in the process of Official Plan updates, OP reviews, or in the preparation of new Official Plans.
- Verify that a municipality's Official Plan will fulfil its obligations for all its housing supply, not just a 15-year land supply.
- Verify that a municipality's intensification plans are realistic and achievable, and its OP policies support achieving its intensification housing target.
- Require application of a consistent methodology for net-to-gross land use analysis by municipalities.
- Institute a statutory timeline for updating these analyses in order to monitor how municipalities are utilizing land.
- Have Planning Act require that Official Plans recognize housing affordability as a goal, and that OP policies and/or development application requirements be considered through a housing affordability lens.

- Enforce the requirement of Section 1.1.1.b of the PPS to have a market-based supply of housing and mix of housing options (including single-detached, semi-detached and row housing) to meet the projected market-based needs of current and future residents.
- Implement HATF Recommendation #2 (Amend the Planning Act, Provincial Policy Statement, and Growth Plans to set “growth in the full spectrum of housing supply” and “intensification within existing built-up areas” of municipalities as the most important residential housing priorities in the mandate and purpose) so that it is clear to municipalities that the housing objectives in their Official Plans need to be appropriate, realistic, and backed up with action in terms of zoning and overhaul of their respective development approvals process.
- Implement HATF Recommendation #51 (Require municipalities and the provincial government to use the Ministry of Finance population projections as the basis for housing need analysis and related land use requirements).

Provincial planning policy and municipal official plans must work in conjunction to provide a framework for comprehensive, integrated, long-term planning that supports the principles of strong communities, a clean and healthy environment and economic growth, for the long term.

The PPS states that municipal OPs are *“the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning” [emphasis added].* **The importance of ensuring that a municipal official plan is well thought out, comprehensive and done right cannot be understated.**

The province directs municipalities to undertake these growth-related studies, and similarly, the province is expected to provide direction to municipalities in accordance with provincial policy.

We are concerned that municipal long range planning, as illustrated above, is no longer centered on the basis of upholding of provincial policy that results in *good planning*.

The province has a responsibility to uphold the integrity and directives of their own provincial policies, and responsible decision-making must matter. Allowing the will of municipal councils to contradict and delay proper long-range planning and growth management works against the province’s goals for housing affordability and supply for residents across the province, both now and in the future.

New Provincial Planning Statement

Following on our comments to EROs 019-6177 and 019-6813, GOHBA encourages the province to move forward expeditiously with the introduction of a new Provincial Planning Statement.

Municipalities and home builders need to have certainty, options, and opportunities to ensure that Ontario can continue finding ways to increase housing supply and the variety of housing choices that could be available in communities across the province.

A new Planning Statement can bring efficiencies in the planning framework and flexibility to expedite planning approvals while bringing more land online for housing supply. Integrating the former PPS with A Place to Grow to create a single, province-wide, housing-focused land use planning policy document is a positive step towards opportunities for increased housing supply and better planning for population and employment growth, and we respectfully urge that the province make every effort to introduce this new policy document in an accelerated timeframe.

Conclusion

GOHBA's fundamental concern is housing affordability and supply for Ottawa's residents.

Ottawa, as with municipalities across Ontario, cannot be in a position where their Official Plans are shooting for housing targets that are well below the housing needs of its residents.

As well, Ottawa's new Official Plan does not recognize the cumulative impact of its policies or how the development requirements it imposes work against being able to provide housing that is affordable. In fact, it acknowledges that some of its policies will increase the cost of housing.

The Ministry of Municipal Affairs and Housing has an obligation to review, assess and make changes to municipal official plans to ensure compliance with the Provincial Planning Statement.

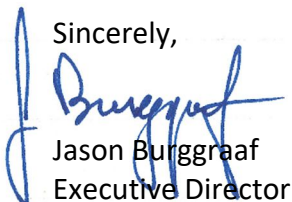
We respectfully submit that MMAH undertake a fulsome review of Ottawa Official Plan and land supply, or refer this to the Ontario Land Tribunal, to ensure compliance with the PPS for land needs and growth management policies.

Due to increased population and the removal of 650 hectares of expansion land, conforming with the 15-year land supply requirement may not be achievable.

In simple terms, the Ottawa Official Plan, including infrastructure and zoning by-laws, are not aligned with the PPS and will restrict and oppose the urgent requirement to create more housing supply.

We are pleased to answer questions or provide further information as requested.

Sincerely,



Jason Burggraaf
Executive Director