



27 MARCH 2024

[Via electronic submission](#)

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

**Re: ERO 019-8273 *Get It Done Act, 2024* – Amending the Official Plan Adjustments Act, 2023**

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*The Waterloo Region Home Builders Association (WRHBA) is the recognized leader and the voice of the new residential home construction, land development, and professional renovation industries in the Regional Municipality of Waterloo, ON. We are an association of knowledgeable, trusted, resourceful, and local professionals, and together, we create vibrant, thriving, and sustainable communities across our regional area comprised of three municipalities and four townships. WRHBA member companies construct over 90% of all new residential construction, making it one of the most significant economic engines driving the Region's economy, creating over 22,000 jobs, 1.5 billion in wages, and 3 billion in investment value.*

*As an Association, we are invested in bringing insight to public policy decision-makers at all levels of government on matters that affect the residential development and construction industry in addressing housing affordability and choice for consumers.*

#### **Environmental Registry Background**

The government is seeking feedback on proposed amendments to the *Official Plan Adjustments Act, 2023* to retroactively reinstate municipally requested modifications to official plans ("OP's") for the cities of Barrie, Belleville, Guelph, Hamilton, Ottawa and Peterborough, Wellington County and the regions of Niagara, Peel, Halton, York, and Waterloo.

**Please accept the WRHBA's submission to the government's request for feedback on the "*Get It Done Act, 2024 – Amending the Official Plan Adjustments Act, 2023*" (ERO 019-8273).**

#### **WRHBA Response**

Ahead of sharing the collective perspectives of our provincial industry counterparts outlined below, we would like to offer some insights into the Waterloo Region which encompasses the cities of Cambridge, Kitchener, and Waterloo and the townships of North Dumfries Wellesley, Wilmot, and Woolwich.

## Waterloo Region

In Waterloo Region, Regional Council and planning staff have focused on planning policy to limit the expansion of urban growth boundaries. This approach does not provide adequate opportunity to satisfy market demand for ground-related and family-oriented housing. When the Province consulted the local Mayors within Waterloo Region on Bill 162, the affected Mayors and their municipal councils unanimously supported the modifications proposed by the Province. WRHBA supports the local councils' efforts to increase the housing supply in the Waterloo Region and applauds their stance. **It is crucial that the Province approves all of the urban area expansions supported by our local municipalities.**

Recently, Waterloo Region and the Province of Ontario have initiated efforts to acquire lands in Wilmot Township, with the intention to designate and develop over 300 hectares of additional employment lands. These efforts were initiated despite decades of Regional planning, including ROPPA 28, which expanded the urban boundary to designate a significant area of large, shovel-ready employment sites for future large industrial users, as well as the current Regional Official Plan which was only recently reviewed and approved with a more limited expansion for both employment and community growth areas. **While the WRHBA supports the move to designate these additional lands in Wilmot Township**, this current need was neither anticipated nor comprehensively planned for in the Region's growth forecasts. Furthermore, the designation of an additional 300 plus hectares of employment lands on the Waterloo Moraine shows that urban development can be appropriately designed to avoid impacts to groundwater.

These additional employment lands will only serve to create more unanticipated demand for housing, including ground-related housing in the Township of Wilmot and nearby urban areas. To ensure that housing supply can keep pace with demand in the Waterloo Region, **consideration must be given to fast-tracking the development of lands affected by Bill 162**, as well as designating additional lands for residential and community development. This will help accommodate both the planned and unanticipated growth in the coming decades.

## Industry Perspectives

Following the introduction of the *Planning Statute Law Amendment Act, 2023* (Bill 150) on November 16, 2023, the most recent introduction of Bill 162, the *Get It Done Act, 2024*, is a step in the right direction in bringing some stability to the municipal land use planning environment in Ontario. Through Bill 162, Ontario is proposing changes to the legislatively approved OPs of some of the Province's fastest-growing municipalities to address local needs while continuing to support the government's goal of building at least 1.5 million new homes by 2031. The proposed *Get it Done Act, 2024*, introduced on February 20, 2024, includes amendments to the *Official Plan Adjustments Act, 2023*, which was enacted by Bill 150.

The proposed amendments reflected in Bill 162 followed consultation with the affected municipalities and, where appropriate, responded to their feedback. These municipalities are the cities of Barrie, Belleville, Guelph, Hamilton, Ottawa, Peterborough, Wellington County, and the regions of Halton, Peel, Waterloo, and York. We understand that modifications that were maintained through Bill 150 impacting these municipalities and the Region of Niagara would continue to apply.

## **Official Plans & the Provincial Policy Statement**

An OP sets forth an upper/lower/single-tier municipality's long-range planning policies on how lands throughout a municipality should be planned for and used. It is often prepared in collaboration with municipal planning staff (including their retained external planning consultants on occasion), input from ratepayer organizations and community members, and municipal councils. This highly public and consultative process is both prescribed by statute and serves a meaningful contribution to the discourse of engagement to ensure that future planning and development will address the needs of community stakeholders over the long term.

*A Place to Grow, the Growth Plan for the Greater Golden Horseshoe ("APTG")*, stipulates that every five (5) years, upper and single-tier municipalities of the Greater Golden Horseshoe ("GGH") are required to plan for and accommodate population and employment forecasts as set forth by the Province, to better co-ordinate planning for future growth. Long-term intra-regional planning and coordination are essential to ensure growth is accommodated in an orderly manner. These growth forecasts are a foundational component of APTG and are to be reviewed by the Minister of Municipal Affairs and Housing ("MMAH") in consultation with municipalities through Municipal Comprehensive Reviews ("MCR") at least every five (5) years.

The last date for municipal conformity for GGH municipalities (per the APTG) was July 1, 2022. Outside of the GGH, municipalities are bound by the Provincial Policy Statement, 2020 ("PPS") and are required to also undertake growth management and long-range planning exercises every ten (10) years that plan for and accommodate growth on a 25-year time horizon.

Provincial planning policy and municipal official plans must work together 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. 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 OP is well conceived, comprehensive, and executed in conformity with the PPS cannot be understated.**

Municipal OPs reflect years of studies, analysis, and policy development between municipal planning staff and expert planning consultants who, as technical and impartial experts in the planning field, worked together to determine precisely where and how their municipalities are required to properly grow to accommodate population growth forecasted over the planning period. 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 some decisions made through Bill 162, which upheld only those OP modifications requested by municipal councils, indicate that long-range planning for the Province's municipalities is no longer centred on the basis of upholding of provincial policy that results in *good planning*. Rather, through Bill 162, long-term growth management and the MCR processes were "politically driven" without due regard to the PPS. In a few cases, local councils overtly disregarded their professional planning staff, peer reviewed studies and planning expert opinions that were tasked with upholding provincial policy directives.

**The Province has an obligation to protect and uphold the principles and directives of both the PPS and APTG.**

We acknowledge the deference that Councils should be given as elected officials from time to time, but we are troubled when there is a misalignment between the voices of elected officials and professional planning staff in those municipalities. Long-established policies (such as the PPS) that are foundational to municipal land use planning must be supported and incorporated into local decision-making. We join the OHBA call on the Minister to uphold the integrity of the Province's policy directives, which may sometimes conflict with the will of elected officeholders in those municipalities.

The PPS speaks to the need for municipalities to promote healthy, liveable, and safe communities that are sustained through efficient development and land use patterns that *accommodate an appropriate mix and range of affordable and market-based residential types [emphasis added]*.

The varying housing typologies referenced in the PPS are reflective of the housing choices Ontarians both desire and/or can afford. More specifically, the "Housing" section of the PPS further stipulates that municipalities *must provide for an appropriate range and mix of housing options and densities required to meet projected market-based and affordable housing needs of current and future residents of the regional market area. [Emphasis added]*

To achieve this objective, municipalities must make every effort to maintain the ability to accommodate residential growth for a minimum of fifteen (15) years through residential intensification and redevelopment AND also maintain an inventory of where new housing development is to occur that also includes land with servicing capacity sufficient to provide at least a three-year (3) supply of residential units.

OPs are meant to identify (and protect) provincial interests and set out appropriate land use designations and policies for how municipalities plan for population and employment growth for periods of twenty (20) years or greater. The last statutory round of MCRs required municipalities to forecast, plan, and accommodate growth to the 2051 planning horizon.

Recent immigration data indicates that Canada plans to welcome 500,000 immigrants per year by 2025, and Ontario's role (the GGH in particular) in accommodating the majority portion of this population will be pivotal. In addition, hundreds of thousands of temporary foreign workers and international students are welcomed to Canada each year, many of whom are located in Ontario and competing for limited housing supply. It can be debated that the 2031 population and employment targets are understated in terms of the immigration targets, and **therefore the land needed for growth will be insufficient to accommodate future land supply for housing and employment needs**. Ontario's municipal growth management efforts must be focused on the 2051 horizon - and instituting long-term regional scale oversight is the sole role and function of the Province and MMAH.

There are increasing concerns that a growing number of municipalities will not comply with the PPS. Failing to do so and without appropriate oversight, these municipalities will continue to fall behind in meeting their growth targets. They may not be adequately prepared to accommodate the forecasted population and employment growth with housing-supportive infrastructure.

**Conclusion:**

We would like to acknowledge those municipalities in the Province that made a clear and admirable attempt to properly plan for growth for the longer term, demonstrating an understanding of what the policy directive was, and were willing to make the tough decisions to uphold the integrity of provincial land use policy.

It is our respectful opinion that the Province is responsible for upholding the integrity and directives of their own provincial policies, and responsible decision-making must matter. Allowing municipal councils to contradict and delay proper long-range planning and growth management for these municipalities will regrettably not serve the Province well in the future.

Finally, we encourage the Province to move forward expeditiously with the introduction of the new Provincial Planning Statement (the "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.

The new Planning Statement, which brings efficiencies in the planning framework and flexibility that is meant to expedite planning approvals while bringing more land online, will be a welcome advancement to the current home-building environment in the Province. Integrating the former PPS with A Place to Grow to create a single, provincewide, housing-focused land use planning policy document is a positive step towards opportunities for increased housing supply and better planning for population and employment growths, and we ask that the Province make every effort to introduce this new policy document in an accelerated timeframe.

We appreciate the opportunity to comment on this proposal. We look forward to continuing our ongoing engagement with the Ministry staff to ensure that our collective efforts are fulfilling our shared goals of delivering on Ontario's housing supply targets while improving housing attainability for current and future Ontarians.

Sincerely,

**WATERLOO REGION HOME BUILDERS' ASSOCIATION**



Marie Schroeder,  
Executive Officer

c: WRHBA Board of Directors  
Ontario Home Builders Association