



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

#108 – 30 Concourse Gate, Nepean, ON K2E 7V7  
Tel: (613)723-2926 Fax: (613)723-2982

May 12, 2024

Provincial Land Use Plans Branch  
777 Bay St, 13th Floor  
Toronto, ON M7A 2J3  
growthplanning@ontario.ca

**Re: ERO 019-8462 Review of proposed policies for a new provincial planning policy instrument**

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 'Review of proposed policies for a new provincial planning policy instrument' (ERO #019-8462).

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

- ERO 019-8273 - Get It Done Act, 2024 - Amending the Official Plan Adjustments Act, 2023
- 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
- ERO 019-2346 - A Proposed Approach to Update the Projection Methodology Guideline

In addition to our comments, we support those submitted by the Ontario Home Builders' Association and our fellow municipal HBAs across the province.

GOHBA is supportive of the government's efforts to address our housing affordability and supply crisis by establishing a more streamlined approach to planning in Ontario that is outcome-focused, relevant, and promotes speed and flexibility.

GOHBA understands that builders throughout the province are facing difficulties in their jurisdictions. With this new PPS, we strongly encourage the government to consider the existing conditions within the residential construction sector. It is crucial for the PPS (and possible amendments to the Planning Act) to align with the government's housing goals while also

fostering collaboration and partnership with municipalities in the shared mission of providing 1.5 million new homes to accommodate our growing population.

There are significant economic and social benefits to municipalities that facilitate housing supply and affordability, including talent attraction and retention, mass transit ridership, and development charge revenues.

GOHBA welcomes a single, integrated policy document on land use planning. With many residential construction companies working in multiple jurisdictions, it is very beneficial to have all municipalities and industry operating in the same regulatory environment across the province as we strive to meet the target of 1.5 million new homes by 2031.

GOHBA supports the overall direction of the new Provincial Planning Statement. We provide comments and additional suggestions on the new PPS below.

### **Specific Comments - 1. Generate increased housing supply**

GOHBA generally supports the proposed changes in the PPS to generate increased housing supply. We offer detailed comments on select provisions:

- ***Require municipalities to provide a range and mix of housing options with an expanded definition to include multi-unit types (laneway, garden suites, low and mid-rise apartments) and typologies (affordable, multi-generational, seniors, student housing)***

While the range and mix of housing options with a broader definition may be intended to be permissive, there is a possibility that this language could be misinterpreted and lead to more rigid and prescriptive applications. The government needs to ensure this policy won't be misapplied by municipalities and exploited to withhold permits for housing types that differ from those preferred by the municipality.

The "range and mix of housing options" must also reflect market-based demand. Demand for single and semi-detached homes is not the same as demand for a multi-unit form of housing.

Assuming these options are interchangeable and that residents and the market view them as equivalent would be an erroneous approach.

Since GOHBA supports providing a range of housing options, we urge the government to strengthen this language to **provide a range and mix of housing options and typologies according to housing demand based on its population and household formation projections.**

This is necessary to counteract municipal planning efforts that live to the letter of the PPS, but completely counteract its spirit and intent.

For example, the City of Ottawa’s New Official Plan is carrying an assumption that a significant portion of grade-related units will be achieved through intensification in what the City is referring to as 613 flats. This is a theoretical housing form created by City staff and consultants which does not exist in the marketplace today, and is best compared to a multi-plex form of housing. There are foreseeable challenges to delivery of this form of housing that have not been resolved, not least of which are the lack of amenity space for families, sufficient parking, and interface issues with existing surrounding homes.

GOHBA supports the broadening of housing permissions to allow for all forms of housing throughout the City’s built-up area. We do not however believe it is appropriate nor good planning to rely on a theoretical and untested form of housing to achieve growth targets.

The New Official Plan requires that over 10,700 single and semi-detached units be converted into multi-plexes to meet the forecasted demand for single and semi-detached units. This is an inappropriate assumption. Demand for single and semi-detached homes is not the same for a plex form of housing, and it is erroneous to assume that residents would perceive it as such from a housing form.

For the purposes of interpreting the City’s housing forecast and compliance with the PPS, the 613 flats should be considered as a form of grade related apartment dwellings (similar to a basement apartment or multi-plex). Moreover, the uncertainty with the theoretical nature of this housing type, coupled with the uncertainty related to delivering a supply of over 10,000 of these units throughout the built-up area results in the City’s New Official Plan adopting a high-risk growth scenario with regard to providing sufficient and appropriate supply of housing to meet projected needs to 2046.

In this regard, City Staff articulated the risks associated with this approach in the hypothetical implementation model prepared January 2021, quoted below:

***“Uptake on development permissions.** While the model assumes “the past is the key to the future” and that a similar rate of uptake will go forward, this is based on market demand, and the ability for the industry to increase production of “missing middle” type housing forms in line with the new permissions.*

***Future lot turnover.** While the model has considered past rates of turnover in geographic context, lot turnover is fully dependent on private market decisions and transactions.*

***Large-household proportion.** While it is anticipated that nearly all ground-oriented housing forms will, as a function of development, be of a size to be considered large-household units, there is uncertainty regarding the extent to which this may occur going forward in “missing middle” forms, given the new permissions. While zoning will have the ability to determine a floor area that is recognized as a large-household unit – and may do so based on geographic context – the achievement of the large-*

*household target is a monitoring issue that will need to be evaluated as the plan unfolds.*

***Delays or appeals.*** *While the new Official Plan makes clear that the zoning bylaw must move towards a form-based approach that increases opportunity for diversity and equity across neighbourhoods – and this evaluation makes clear the extent of what that new zoning framework must achieve – there are on the ground realities and complexities involved in major zoning and land use exercises that may impact timing and extent of roll-out of new policies. Further, while the new Official Plan is not subject to appeal, the new Zoning By-law is.”*

The New Official Plan is not based on an approach that would neither eliminate nor mitigate these risks.

Without a risk elimination or mitigation strategy, the City will fail to accommodate the vast majority of the 9,400 single and semi-detached homes it has forecasted as being required to 2046 that are now proposed to be accommodated through 613 flats.

Moreover, this would result in a foreseeable housing shortage and financial shortfalls from lost development charge revenue.

The City did not undertake an update to its growth demand forecasts prior to adopting the New Official Plan. There is an inherent lack of consistency and transparency in providing a forecast demonstrating market-based needs for housing by type that requires the City to plan for an additional 10,000 single and semi-detached housing form, than adopting a New Official Plan that assumes these units will be converted to apartments.

In failing to provide sufficient opportunity (either through intensification or additional land) for the required supply of single and semi-detached units, the City’s Official Plan fails to provide a market-based range of housing options and therefore is generally NOT consistent with the PPS

As a result, the intensification target proposed by the City is NOT achievable as there is insufficient opportunities to accommodate growth through intensification.

As a result, the proposed settlement expansion and New Official Plan is not consistent with the PPS as insufficient land has been provided to accommodate single and semi-detached housing units. Further, the intensification target in the New Official Plan has not been set in the context of local conditions and is not consistent with the PPS.

Predictably, homebuyers and businesses will locate where there are opportunities for workers to be housed and will likely result homeowner moving outside of the City to find appropriate housing.

A migration outside of the City would be undesirable from a planning perspective as it would direct growth to smaller settlement areas within commuting distance of Ottawa, putting pressure on smaller communities to accommodate growth where sufficient infrastructure, transit and a mix of uses may not be available.

- ***2.4.2 (1) Planning authorities shall delineate the boundaries of major transit station areas on higher order transit corridors ... shall define an area within an approximately 500 to 800-metre radius of a transit station***

GOHBA supports the province identifying the minimum heights and densities that could be planned in relation to varying surrounding urban development and the form of transit service. Municipalities must plan for transit supportive density focused on MTSA's and UGCs with minimum height and density permissions, and where stating maximum heights or densities should be discouraged.

The PPS delineates specific boundaries for major transit stations and higher order transit corridors, aiming to set minimum density targets in their proximity. However, the City of Ottawa has presented challenges by suggesting that many of the municipality's new light rapid transit stations do not fall under the definition of key transit station, and thus would not warrant greater height permissions in the vicinity – eg, as opposed to having a 800 metre radius for a major transit station area, the radius is 500 metres or less.

The PPS defines the radius of major transit stations as 500-800 meters or about a 10-minute walk, while Ottawa's current OP generally uses an 800-900 meter radius. Additionally, the City has classified the light rail transit stations at different orders. The PPS needs to make sure that all stations in an LRT system are treated equally, as well as ensuring that all municipalities are using the same radiuses to define major transit station areas.

**Therefore, the PPS should set a minimum radius of 800 meters for stations or stops on planned or existing higher-order transit routes and Urban Growth Centres (UGC).** The current language is too vague and could encourage municipalities to set their MTSA's smaller than they should be.

### **Specific Comments - 2. Make land available for development**

GOHBA generally supports the proposed changes in the PPS to make more land available for development. We offer detailed comments on select provisions:

- ***Require municipalities to base growth forecasts on Ministry of Finance population projections ...***

GOHBA strongly supports the mandatory use of Ministry of Finance population projections to ensure that provincial housing goals are being met 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. Otherwise, it will be very difficult to achieve a balanced approach that offers the types of housing that Ontarians require.

Using Ministry of Finance population projections would ensure a projection methodology that focuses on housing affordability and attainability objectives, and provide needed direction, consistency, and specificity in the determination of projected market-based needs. This also addresses outstanding concerns with previous Projection Methodology Guidelines

It is important that the projections undertaken by municipalities are grounded in real time data and evidence. Provincial data therefore also needs to speak to age-specific propensities that would occupy housing by type. Generally, current population forecasts have assumed that the aging population is downsizing and occupying smaller homes. In reality, a significant portion of this age group is remaining in their family homes thereby reducing the turnover rate.

In addition, GOHBA feels that household formation rates by age and by size are key to determining the necessary future housing mix and therefore the types of housing that will be required going forward.

Housing formation rates are key to the determination of needs by housing type.

GOHBA also recommends that the Ministry of Finance provide employment projections related to employment/mixed use areas (E/MUA's). It will be important for municipalities to ensure that adequate land supply is provided for such uses. At the same time, the E/MUA's will provide intensification opportunities where in the past employment lands tended to be underutilized and at lower densities.

- ***Provide a simplified and flexible approach for municipalities to undertake settlement area boundary changes at any time, with requirements for municipalities to consider additional criteria related to need for the expansion to accommodate growth, infrastructure capacity, phasing of growth, achievement of housing objectives, consideration of alternative locations to prime agricultural areas, and impacts on agricultural systems***

GOHBA strongly supports the ability of an urban or village expansion to be requested through an Official Plan Amendment by a private landowner or the municipality, without the requirement of a municipal comprehensive review.

This is necessary in order to address deficiencies in municipal official plans related to land availability.

For example, GOHBA believed (and still believes) that the City of Ottawa overstated the number of households that could be accommodated through intensification in the land budget, and in turn understated the number of households to be accommodated in greenfield areas, including urban expansion areas.

In its submission to ERO #019-8273, GOHBA detailed the significant housing shortage over the next twenty years that Ottawa's residents will face due to deliberate decision-making in the development of its Official Plan.

In summary, GOHBA called for the amount of expansion land to be increased from the approved 1,200 ha to 3,250 ha.

GOHBA argued that the OP as it currently stands 1) Proposes an unachievable intensification rate that is not based on historical patterns; and, 2) Is not consistent with the PPS as it proposes a mix of housing units that does not reflect market-based demand, ie, 613 Flats.

92,000 dwelling units have to be accommodated within the built-up area in order for the "Balanced scenario" GMS to be achieved - 49,400 ground-oriented and 42,700 apartment dwellings. Of those 49,000 ground-oriented lots, the City is counting on 37,000 'large' dwelling units (with three or more bedrooms) to come from converting approximately 15 per cent of the existing lots adjacent and within walking distance to Hubs and Corridors to be redeveloped into 613 Flats. The Balanced Scenario allocates 38 per cent of total ground-oriented dwellings "through a mix of traditional built-forms and suitable alternatives such as 613 Flats or other innovative redevelopments (page 41)". In the past 10 years, 11 per cent of ground-oriented units occurred within the built-up area.

GOHBA recommended that the OP be changed to the so-called "status quo" growth scenario, which would bring the land expansion to 2,450ha. We then recommend that the growth projections be updated from the numbers approved in 2019 to the Ministry of Finance's current growth projections for Ottawa, which translate to a need for 3,250ha of new urban land.

GOHBA has since commissioned a third-party to estimate what updated population projections may mean for residential land supply needs in the City of Ottawa and whether the City of Ottawa would meet this policy. The updated Ministry of Finance forecasts show that the City of Ottawa can be expected to grow to 1.65 million persons by 2046.

Preliminary estimates are that the new Ministry of Finance forecasts would result in the need for 10,168 residential units per year between 2021 and 2046, or a total of 254,208 units for the 25-year period (the OP is based on 194,000 units to 2046).

Preliminary conclusions are that to meet demand over the next 25 years, the City will need a further urban boundary expansion of:

- 693 gross hectares to meet the population projections adopted in the Official Plan; and,
- 2,449 – 4,252 gross hectares to meet Ministry of Finance's most recent population projections, depending on the realized rate of intensification.

Due to this decision-making, there 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.

**The ability to submit a private-application for an urban or village expansion could help municipalities who (deliberately or not) underestimate their land needs and avoid a structural housing deficit in their Official Plans.**

GOHBA also supports the general policies outlined in the new PPS regarding Settlement Areas, Settlement Area Boundary Expansions, and Strategic Growth Areas. In particular, the policies that require minimum densities in major transit station areas and other strategic growth areas will ensure that opportunities for higher-density housing forms can be realized in areas that benefit from existing or planned transit.

It would be beneficial to affirm that municipalities cannot impose additional restrictions or criteria beyond what is outlined in the PPS. Currently the City of Ottawa imposes additional requirements including such considerations as:

- Required components of municipal infrastructure that are planned or available, have sufficient capacity, are financially viable over their life cycle, and protect health, safety and the natural environment. (This is not done now. It would be a very cumbersome undertaking that cannot be completed by a private proponent. This review requires many details that only the City knows).
- The adjustment supports the ability to meet intensification targets identified (How does urban regeneration come into play when assessing existing reserve capacity for growth lands?).
- New or additional lands within the urban boundary or within a village have appropriate municipal services, and enough existing reserve capacity.



Settlement Area Boundary Expansions should be permitted outside of a comprehensive review without a limitation as to the size. The new policy should also promote the use of alternative servicing solutions to permit development in areas where typical full municipal servicing solutions are not viable.

GOHBA further supports the use of alternative servicing solutions to enable development in areas where typical full municipal servicing solutions are not viable. The province should prepare guidance material regarding the minimum densities and size of developments appropriate for different servicing solutions.

### **Specific Comments - 3. Provide infrastructure to support development**

GOHBA generally supports the proposed changes in the PPS to provide infrastructure to support development.

Municipalities should establish phasing policies linked to the cost effective and efficient extension of services to guide future settlement expansions.

As re-iterated from GOHBA's submission for ERO 019-6177 in December 2022, the extreme polarization surrounding infrastructure capacity considerations and decisions is significantly impeding the growth and prosperity of municipalities. The province could remove political drivers in infrastructure planning by:

- Requiring Secondary Plans to be completed with over-sized and over-depth infrastructure, protecting the next development from facing the challenge of increasing capacity for future growth.
- Encouraging municipalities to conduct capacity analyses that extend beyond the immediate planning horizon, which will avoid the need to repeat detailed MOE studies every time an upgrade is required.
- Encouraging municipalities to strategically locate infrastructure outside of urban boundaries to optimize the net-to-gross use of urbanized lands
- Eliminating MOE Risk Assessments on neighbouring lands that are not responsible for contamination.

Many municipalities are facing challenges with both stormwater and wastewater infrastructure.

In Ottawa there is a particular concern around stormwater capacity, and the City is considering a new requirement for onsite stormwater management for new infill projects because the City's existing infrastructure is at capacity.

If the City doesn't know the capacity of its stormwater infrastructure or what upgrades are required, it cannot make fair assessments about which lands can support intensification?

If land use and infrastructure are going to be successfully integrated, the Infrastructure Master Plan (IMP) and other master plans need to extend the planning horizon to match the OP planning horizon of 25 years and its land use planning principles.

Another challenge is that many decisions about residential intensification are being controlled by the IMP rather than planning policies or zoning. The current system relies on development charges to fund infrastructure, but often, the infrastructure is not in place when needed and the City is planning to use the status of existing infrastructure to possibly withhold or withdraw building permits. Consequently, desirable and needed housing projects will be put on hold due to the lack of timely infrastructure.

GOHBA's significant concern is that infrastructure capacity is or will become the major determining priority for potential intensification over all other considerations, such as proximity to transit.

#### **Specific Comments - 4. Balance housing with resources**

GOHBA generally supports balancing housing and environmental concerns, however we are concerned with the language under Section 2.9 (1), which "require municipalities to prepare for the impacts of a changing climate through land use planning, develop approaches to reduce greenhouse gas emissions, improve air quality."

In March 2022 the City of Ottawa adopted its High Performance Development Standard (HPDS), based on the Toronto Green Standard.

For over two years GOHBA members worked with City staff on the HPDS, both on the standards themselves and their implementation as part of the development application review process.

Throughout the process our primary concern has been the impact of the HPDS on housing affordability and the inevitable delays in application processing timelines when we as a city are striving to build 15,000 new homes a year.

Although GOHBA was supportive of the aims of the Standard, we had (and continue to have) ongoing concerns related to affordability; achievability, energy efficiency requirements above code, and phasing.

There is a cost implication to each of the HPDS measures that has yet to be quantified. There are also direct costs to developers and builders, but ultimately the bearer of these increased costs is the home buyer.

While we appreciate that some (although definitely not all) of these measures have the potential to reduce operating costs for the homeowner, there is still the consideration of the impact on these measures on a home's sticker price.

We have urged the City of Ottawa to work with builders on their energy-efficiency goals, without avail. Therefore we strongly request the provincial government's intervention in this regard to force municipalities to work with the industry on high performance measures, through a housing affordability lens.

We also caution that municipalities may attempt to push some former site plan requirements into the building permit approval process. Amendments should make clear that municipalities do not have the authority to demand items beyond the Building Code.

GOHBA does not accept the City's assertion that Sections 41 and 51 of The Planning Act gives it the authority to require energy performance beyond the Ontario Building Code.

GOHBA had previously supplied City staff with a legal analysis prepared for the Durham Region HBA for the same circumstances [extract]:

*"[Aird & Berlis LLP] are of the opinion that municipalities do not have the authority to impose on land developers/builders a construction standard for energy efficiency which exceeds the Building Code. The Building Code governs construction-related environmental sustainability measures, which means that such measures are beyond municipalities' regulatory authority. Furthermore, sections 41 and 51 of the Planning Act do not grant municipalities the authority to regulate energy efficiency construction as part of their site plan control or draft plan of subdivision processes. Similarly, municipalities do not have the authority to link occupancy permits to energy efficient construction other than to note same be Code compliant."*

If the City was confident in its legal status to impose certain HPDS measures, we question why the City requested that the Government of Ontario amend energy requirements in the Ontario Building Code and/or give municipalities the authority to implement measures for increased resiliency and net zero emissions.

The Building Code is already set to have net zero for residential buildings by 2030. It is also critical to respect the Code development process, which provides for peer-review and a rigorous analysis of cost-benefit and impact of proposed changes on the house-as-a-system model.

**The provincial government cannot support municipalities' establishing their own authority outside of the Ontario Building Code.**

The City estimates that the HPDS would mean a 1-10% increase in construction costs, including \$11,000 per unit for multi-unit residential.

In its comments to ERO 019-6172 Development Charges, **GOHBA recommended that the province institute a reduction to development charges when green buildings and/or infrastructure is provided in order to offset costs and encourage housing affordability.** We reiterate that recommendation now.

## **Specific Comments - 5. Implementation**

GOHBA generally supports the proposed changes in the PPS on implementation.

Transition provisions are critical to allow all stakeholders to properly implement new policies.

### **Further Considerations**

#### **Protected Major Transit Station Areas**

As referenced above, GOHBA is concerned with how the City of Ottawa is utilizing (or rather not utilizing) PMTSAs through its approach to zoning individual transit stations.

GOHBA believes that the areas around LRT stations / “Hubs” in Ottawa’s Official Plan / PMTSAs play a critical role in the City’s housing goals, and could be used to provide more housing than the approximately 45,000 units currently envisioned in the OP, as well as ensuring a built-in ridership for our LRT system.

It is critical to note that PMTSAs are where the Official Plan conceives that most high-density multi-family buildings will be located. It’s also 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.

As part of its recent Omnibus Official Plan Amendment (approved by the Planning and Housing Committee on September 6 and Council September 13, 2023), the City wanted to “Clarify [a] footnote to reduce potential confusion regarding which Hubs are PMTSAs.”

The City is incorrect in its assertion that some stations - either built, under construction, or planned - do not trigger greater heights because they are not “key transfer stations”. The term “Key transfer station” does not exist in a single policy document of the City of Ottawa, and it is not defined in the Planning Act, the Provincial Policy Statement 2020 nor the proposed Provincial Planning Statement 2024.

Moreover, there is direction from the Province that the areas around all transit stations are expected to accommodate more residential density. It is therefore GOHBA’s position that the City is incorrect when it attempts to limit what is a PMTSA that is to permit more density and heights.

We are very concerned with this line of thinking, that it could be assumed in other municipalities, and the negative impact it could have on the municipal intensification goals, as well as housing affordability and supply for residents across Ontario.

### Retain Planning Fees in the Department

In order to avoid perpetual fee hikes, it is essential that all fees collected for Planning Services remain in the department, and any operating surplus to be transferred to a reserve fund, as is done with Building Code Services.

This will support three key objectives:

- The department's financial sustainability;
- Consistency of service and performance despite ebbs and flows in the housing market; and,
- Management oversight that increases accountability and transparency.

Building Code Services (BCS) is required to create and maintain a contingency fund with the excess revenue it holds at the end of the year from its fees for service. This allows BCS to maintain their level of service and staffing if there is a period of time where they do not receive their expected fee for service revenues. BCS also has to consider the size of their contingency fund in setting their fee levels for the next year.

The Province should require that municipal Planning Departments change management of their fee for service revenues to retain fees within the department, following the Building Code Services model, which not only ensures that the money is spent for the purpose it was collected for, but would also provide the department with the resources to continue its level of service and staffing in an economic downturn.

### Address Issues with the Land Titles Office

Ever since there were changes to the organization of the Land Titles Office administration to centralize operations and responses to concerns and questions, the development industry has experienced processing issues and lengthening timelines to register lands. Contrary to the intent, this has substantially slowed every aspect of the registration system.

A typical subdivision goes through an Application for Absolute Title, registration of a Plan of Subdivision, registration of reference plans for easements and other requirements, the registration, temporary lifting and final lifting of Inhibiting Orders, conveyances and reconveyances of municipal reserves and conveyances to homeowners.

The centralization of Land Titles services has slowed this entire process down, and made dealing with issues nearly impossible, as officials processing files do not have local knowledge, and there is no consistency in processing from file to file.

This has negative implications for the delivery and cost of housing.

The province needs to devote more resources to the Land Titles Office, set a consistent process for registering lands, and re-designate local officials to process local files.

## Appeal Rights

It is notable that eliminated third party appeals to applicant initiated processes, such as OPAs, ZBLAs, consents and minor variances are a very strong positive step to streamlining municipal approval processes, and reducing the volume of meritless appeals at the Ontario Land Tribunal.

GOHBA supports preventing abuse of the appeal process by limiting third-party appeals but as the legislation is currently worded, appeal rights have been too limited. Affected landowners will not be able to appeal a municipal initiated official plan or zoning amendment.

Eliminating the ability of individuals, landowners, and public bodies to avail themselves of Tribunal intervention to resolve land use planning disputes will likely result in individuals commencing applications to quash municipal by-laws or otherwise attack local decision making on procedural grounds via the Judicial Review Procedure Act, increased Building Code Act, 1992 appeals, and other Superior Court proceedings. If land use planning matters are increasingly dealt with by the Courts, or other non-specialized bodies with limited capacity, rather than the Tribunal – a forum with the institutional knowledge and specialized expertise to effectively resolve complicated land use planning issues – the unintended consequence may be further delay of development of new homes in the Province.

**Since developers and land owners are the ones governed by municipal plans, and are the ones who must implement and execute the rules and regulations within, they should not be considered a third-party and should have the right to appeal.**

GOHBA elaborates fully on this issue in its submissions to ERO 019-8369 and ERO 019-8370.

## Population and Housing Targets for Eastern Ontario

The proposed PPS 2024 references “population, housing and employment projections” to be considered for regional market areas as appropriate. Although not directly related to policies within the new PPS, we urge the provincial government to focus more of its housing policy towards Eastern Ontario.

Currently, the provincial housing target for Eastern Ontario is 173,300 homes as part of its 1.5 million new homes over the next decade.

This is spread across five municipalities: Ottawa (151,000), Kingston (8,000), Belleville (3,100), Peterborough (4,700) and Kawartha Lakes (6,500).

As per the enclosed chart, GOHBA is currently estimating the need for 197,107 homes from Peterborough to Ottawa, Haliburton to Cornwall by 2031, with demand for housing spread over many smaller, rural and semi-rural municipalities.

We believe that many more people will settle in Eastern Ontario than the government is currently planning for, and this will strain planning and infrastructure resources, leading to decreasing affordability across the region.

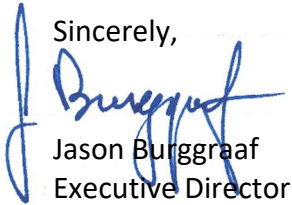
GOHBA urges the province to ensure that its housing policies and supports, including infrastructure funding, properly consider Eastern Ontario's role in providing housing for Ontarians, now and in the future.

### **Conclusion**

GOHBA is in support of creating a streamlined province-wide land use planning policy instrument.

Thank you for the opportunity to provide comments on this proposal. We are pleased to answer questions or provide further information as requested.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Burggraaf", is written over a light blue horizontal line. The signature is stylized and cursive.

Jason Burggraaf  
Executive Director





Municipality	Census Division	Our Estimate	Provincial Target
	<b>TOTAL</b>	<b>197,107</b>	<b>173,300</b>
Cornwall (CY)	Stormont, Dundas and Glengarry	2,338	
South Glengarry (TP)	Stormont, Dundas and Glengarry	672	
South Stormont (TP)	Stormont, Dundas and Glengarry	657	
North Dundas (TP)	Stormont, Dundas and Glengarry	583	
South Dundas (MU)	Stormont, Dundas and Glengarry	530	
North Glengarry (TP)	Stormont, Dundas and Glengarry	498	
North Stormont (TP)	Stormont, Dundas and Glengarry	370	
Akwesasne (Part) 59 (IRI)	Stormont, Dundas and Glengarry	86	
Clarence-Rockland (C)	Prescott and Russell	2,756	
Russell (TP)	Prescott and Russell	2,096	
The Nation / La Nation (M)	Prescott and Russell	1,429	
Alfred and Plantagenet (TP)	Prescott and Russell	1,064	
Hawkesbury (T)	Prescott and Russell	1,063	
Champlain (TP)	Prescott and Russell	904	
Casselman (VL)	Prescott and Russell	392	
East Hawkesbury (TP)	Prescott and Russell	357	
Ottawa (CV)	Ottawa	109,600	151,000
Brockville (CY)	Leeds and Grenville	1,431	
North Grenville (MU)	Leeds and Grenville	1,220	
Rideau Lakes (TP)	Leeds and Grenville	759	
Elizabethtown-Kitley (TP)	Leeds and Grenville	645	
Leeds and the Thousand Islands (TP)	Leeds and Grenville	630	
Edwardsburgh/Cardinal (TP)	Leeds and Grenville	507	
Augusta (TP)	Leeds and Grenville	477	
Gananoque (T)	Leeds and Grenville	361	
Prescott (T)	Leeds and Grenville	304	
Merrickville-Wolford (VL)	Leeds and Grenville	221	
Athens (TP)	Leeds and Grenville	201	
Front of Yonge (TP)	Leeds and Grenville	182	
Westport (VL)	Leeds and Grenville	41	
Mississippi Mills (T)	Lanark	1,605	
Carleton Place (T)	Lanark	1,297	
Smiths Falls (T)	Lanark	968	
Beckwith (TP)	Lanark	947	
Drummond/North Elmsley (TP)	Lanark	826	
Perth (T)	Lanark	704	
Lanark Highlands (TP)	Lanark	608	
Tay Valley (TP)	Lanark	603	
Montague (TP)	Lanark	436	
Kingston (CY)	Frontenac	7,787	8,000
South Frontenac (TP)	Frontenac	1,160	
Central Frontenac (TP)	Frontenac	264	
North Frontenac (TP)	Frontenac	120	
Frontenac Islands (TP)	Frontenac	102	

Loyalist (TP)	Lennox and Addington	1,779	
Greater Napanee (T)	Lennox and Addington	1,589	
Stone Mills (TP)	Lennox and Addington	761	
Addington Highlands (TP)	Lennox and Addington	216	
Belleville (CY)	Hastings	4,492	3,100
Quinte West (CY)	Hastings	3,717	
Tweed (MU)	Hastings	501	
Stirling-Rawdon (TP)	Hastings	414	
Centre Hastings (MU)	Hastings	385	
Tyendinaga (TP)	Hastings	352	
Marmora and Lake (MU)	Hastings	337	
Hastings Highlands (MU)	Hastings	330	
Bancroft (T)	Hastings	325	
Tyendinaga Mohawk Territory (IRI)	Hastings	225	
Madoc (TP)	Hastings	187	
Deseronto (T)	Hastings	156	
Faraday (TP)	Hastings	138	
Carlow/Mayo (TP)	Hastings	80	
Wollaston (TP)	Hastings	62	
Tudor and Cashel (TP)	Hastings	59	
Limerick (TP)	Hastings	30	
Prince Edward County (CY)	Prince Edward	1,969	
Cobourg (T)	Northumberland	1,977	
Port Hope (MU)	Northumberland	1,656	
Trent Hills (MU)	Northumberland	1,265	
Brighton (MU)	Northumberland	1,221	
Hamilton (TP)	Northumberland	1,132	
Alnwick/Haldimand (TP)	Northumberland	732	
Cramahe (TP)	Northumberland	639	
Alderville First Nation (IRI)	Northumberland	39	
Peterborough (CY)	Peterborough	6,865	4,700
Selwyn (TP)	Peterborough	1,421	
Cavan Monaghan (TP)	Peterborough	808	
Douro-Dummer (TP)	Peterborough	593	
Otonabee-South Monaghan (TP)	Peterborough	557	
Trent Lakes (MU)	Peterborough	460	
Havelock-Belmont-Methuen (TP)	Peterborough	399	
Asphodel-Norwood (TP)	Peterborough	388	
North Kawartha (TP)	Peterborough	220	
Curve Lake First Nation 35 (IRI)	Peterborough	97	
Hiawatha First Nation (IRI)	Peterborough	34	
Kawartha Lakes (CY)	Kawartha Lakes	8,696	6,500