



560 Wellington Street, 2nd Floor
London, ON
N6A 3R4

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Honourable Paul Calandra
Minister of Municipal Affairs and Housing
37 Sandiford Drive, Suite 400
Stouffville, ON
L4A 3Z2

RE: ERO #019-8642 - PROPOSED PROVINCIAL PLANNING STATEMENT (2024)

Minister Calandra:

After more than a year following from the initial publication of a new Draft Provincial Planning Statement (PPS) for Ontario, the Ministry of Municipal Affairs and Housing has released a final draft document for consultation.

While we welcome the increased certainty a new PPS will bring to planning and development of housing in Ontario in 2024, we are concerned that the latest version of the document represents a significant regression from the 2023 draft PPS and seems counterintuitive to providing housing for Ontarians.

Within this letter, we have taken the liberty of proposing minor text revisions to the draft PPS which we believe will better position the Province to deliver housing, infrastructure and employment opportunities which will keep pace with demand, ensuring improvement of affordability in the housing market and a sustained and vital Ontario economy.

Below, we have provided excerpts of policies as they appear in the draft PPS with proposed revisions and a brief summary of our rationale for the proposed revision directly following. While we believe the new PPS includes many positive directions and changes compared to the existing framework, we also believe that the changes we outline are necessary to achieve the stated goals and priorities of the Province related to housing and the economy.

We have also included a request for the Province to issue a prescribed Land Needs Assessment methodology to apply to all Ontario municipalities as was the case for municipalities within the Greater Golden Horseshoe.

Proposed Revisions to Draft PPS (2024)

2.1.1. As informed by provincial guidance, planning authorities shall base **minimum** population and employment growth forecasts on Ministry of Finance 25-year projections and may **modify increase** projections, as appropriate.

Rationale

While we believe the wording as written communicates the Province's intent that any modifications to Ministry of Finance projections would be to increase rather than decrease projections, we also believe that further clarity on this intent through these minor revisions would alleviate any potential for dispute in the future. Most municipalities in Ontario, outside of the Greater Golden Horseshoe, have been developing their own population and employment projections through expensive, lengthy public processes. Further clarity on this proposed new directive will help to expedite planning for housing and infrastructure and ensure that supply will meet demand across Ontario municipalities.

2.1.3. At the time of creating a new official plan and 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 **20 25** years, **but not more than 30 years**, informed by provincial guidance. Planning for *infrastructure, public service facilities, strategic growth areas* and *employment areas* may extend beyond this time horizon.

Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.

Rationale

The proposed revision to required minimum planning horizons for official plans in Ontario which was included in the 2023 draft PPS was a welcome change. Development of housing and industry in Ontario are processes that takes many years and often span across decades from initial land acquisition through to issuance of a building permit. By prescribing a minimum 25 year planning horizon, the Province would better equip municipalities with tools to achieve meaningful long-term growth planning within their borders.

Utilizing a 25-year planning horizon would also align with the new direction that municipalities use population and employment projections issued by the Ministry of Finance which use a 25-year outlook when planning for new growth.

2.1.4. To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the *regional market area*, planning authorities shall:

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and
- b) maintain at all times where new development is to occur in designated growth areas, land with servicing capacity sufficient to provide at least a ~~three~~ five-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.

Rationale

Municipalities in Ontario use varying methods of controlling growth and the orderly progression of urban areas through the provision of municipally controlled infrastructure. The proposed revision to increase the land supply from 3 to 5 years is in recognition of the failure of the just-in-time delivery model we have become accustomed to in Ontario. Municipalities across the province are experiencing a housing crisis caused in large part by lack of supply. By requiring municipalities to accommodate housing across a larger area with shovel-ready land, we can be more nimble to respond to local and regional market dynamics.

4.1.1. ~~Natural features and areas~~ *Natural heritage features and areas* shall be protected for the long term.

Rationale

We believe that the proposed revision will assist with implementation and delineation of the features to be protected as the original policy would intend.

4.3.2.5. Where a residential dwelling is permitted on a lot in a *prime agricultural area*, up to two additional residential units shall be permitted in accordance with provincial guidance, provided that any additional residential units:

- a. comply with the *minimum distance separation formulae*;
- b. are compatible with, and would not hinder, surrounding agricultural operations;
- c. have appropriate *sewage and water services*;
- d. address any public health and safety concerns;
- e. are of limited scale and are located within, attached, or in close proximity to the principal dwelling or farm building cluster; and
- f. minimize land taken out of agricultural production.

The **A** additional residential units may only be severed in accordance with policy 4.3.3.1.c).

Rationale

While a minor revision, we believe that inclusion of the word “the” clarifies the application of the policy to the two additional residential units which 4.3.2.5. facilitates, rather than any other potential units.

Establishing a Land Needs Assessment Methodology for Ontario

In addition to the suggested revisions we have outlined above, we also request that the Province establish a province-wide Land Needs Assessment (LNA) methodology within the new PPS. In 2020, the Province issued a new LNA methodology for the Greater Golden Horseshoe which required that land supply be calculated based on the provision of a market-based supply of housing.

Prescribing the same methodology across Ontario through the proposed PPS will ensure that municipalities are required to acknowledge and plan for the types of housing that people desire, avoiding the escalation of cost for the most in-demand unit types. It will also require that municipalities plan for growth in a way that will reflect a changing demographic profile over time.

Municipalities across Ontario use a varied set of assumptions and ideologies about growth and housing when developing their official plans. Standardizing the way that municipalities plan for growth through a unified LNA methodology will ensure an even playing field across the province and further support the Provincial government in its goal to restore housing affordability for Ontarians.

Summary of Proposed Revisions

- 1. Ensure municipalities plan for anticipated growth with Provincial projections treated as a minimum expectation.**
- 2. Align the minimum planning horizon with the Province's minimum growth projection timelines.**
- 3. Align long-term land supply with the required minimum planning horizon and increase the supply of development-ready land.**
- 4. Increase clarity regarding protection of significant natural heritage features and areas by utilizing a defined term rather than plain text.**
- 5. Increase clarity surrounding additional residential units in agricultural areas and severances of the same.**
- 6. Prescribe a Provincial Land Needs Assessment Methodology for all Ontario municipalities.**

Should you have any questions on this topic, please reach out to me directly.

Sincerely,



Stephen Stapleton

Vice President, Auburn Developments
sstapleton@auburndev.com | 519-434-1808