



May 10, 2024

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**Via Email**

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**RE: Proposed Provincial Planning Statement  
ERO No. 019-8462**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) is a private consulting firm providing expert land use planning advice to proponents seeking to secure required municipal approvals for a variety of development projects throughout southern Ontario. UrbanSolutions would like to thank you for the opportunity to comment on the proposed new Provincial Planning Statement via ERO No. 019-8462 (hereinafter, the “PPS”).

As the Province works to address the housing crisis currently facing Ontario, the structure and policies outlined within the PPS will become even more critical to achieving the level of density and intensification desired across various regions of the Greater Golden Horseshoe. However, it is clear that the Province realizes that the current housing crisis cannot reasonably be addressed through intensification and increased densities within existing settlement area boundaries alone. There is a need for targeted, smart growth that incorporates logical extensions of existing settlement area boundaries. Given the local politics that are often associated with municipal settlement area boundaries, the Province is correct to ensure that Provincial policy addresses these matters in a top-down approach.

A prime example of this has been evident in the City of Hamilton. In November 2022, the Ministry of Municipal Affairs and Housing approved a revised version of the Urban Hamilton Official Plan. One of the notable changes made by the then-Minister was the introduction of six Urban Expansion Areas to the City’s Urban Boundary. For purposes of full disclosure, UrbanSolutions represents the landowners group for the White Church Road Urban Expansion Area bounded by White Church Road East, Upper James Street, Airport Road East and Miles Road in the City of Hamilton. However, wherever possible, we have ensured our comments and responses are broad enough to encompass other urban expansion options. Given their greenfield nature and ability to accommodate current trends in the housing industry, the Urban Expansion Area lands in Hamilton provide an ideal case study for the opportunities and challenges presently existing in the policy framework with regards to the implementation of the housing development.

In response to the proposed PPS as well as the legislative proposed changes through Bill 185, our team has provided a list of recommendations to be considered during the Ministry’s current consultation period. UrbanSolutions will make itself available should any representative of the Ministry wish to discuss these recommendations in further detail.

## Population and Employment Targets

One of the proposed changes to the PPS is the removal of Provincially-established growth targets which were traditionally applied through Schedule 3 of the Growth Plan. Instead, Section 2.1.1 of the PPS would state that planning authorities shall base population and employment growth forecasts on Ministry of Finance 25-year projections and may modify said projections as appropriate. Section 2.1.2 of the PPS would build on this policy stating that notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.

We have some concerns with this approach to growth targets in municipalities throughout the Province. One concern with this approach is that the wording of Policy 2.1.1 notes that planning authorities can modify the 25-year Ministry of Finance projections “as appropriate”, rather than establishing population and employment targets that must be accommodated in order to meet anticipated demand. Under the proposed scenario, a municipality’s desire to reflect accurate growth forecasting will be dependent on their overall desire for development within their municipality. While some municipal governments do understand the important need for housing at this time, there are still many which allow local agendas and/or NIMBY-style lobbying to influence housing decisions. Accordingly, we strongly encourage the Provincial government to revise Policy 2.1.1 to establish firm population targets to be realized by planning authorities:

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

Further, the implementation of Policy 2.1.2 comes into question when considering a municipality that is continuing to forecast based on a previous population and employment projection issued by the Province, such as Schedule 3 of the Growth Plan. With the Growth Plan proposed to be revoked, clarity is required to confirm how a municipality would establish policies and intensification targets based on a Schedule that is no longer in effect or available to the public. Additionally, it is unclear how long the projections contained in the current Schedule 3 of the Growth Plan would be able to be relied on by municipalities in the face of changing demographics within the Province, based on aging-in-place preferences, shifting immigration and other factors. Ultimately, we believe selecting a singular source to inform population and employment projections would provide the necessary clarity in implementation and consistency across the Province.

We have further concerns about which authority would ultimately interpret and distribute the provincial population projections to individual municipalities, as the policy is currently written to suggest municipalities themselves would take on this responsibility. A system where municipalities are left to independently determine their own share of the anticipated growth lacks functionality. Often the private sector relies on prescribed population targets attributed to municipalities in order to demonstrate need for the development of housing or employment land uses. Without clear population targets for each municipality established, it becomes difficult to convince a local authority that there is increased need within their area – especially market-based need. As noted above, municipalities vary in their perspectives on development and growth and this variation could lead to inefficient distribution of growth based on

municipal desires. The housing choices available to hopeful new homeowners should not be solely dictated by local authorities that are acting beholden to the anti-development desires of existing ratepayers.

### **Noise Exposure Forecast (NEF) Contours**

The PPS proposes that sensitive land uses such as residential dwellings will not be permitted in areas that exceed NEF 30. However, Policy 3.4.2(b) of the PPS proposes that redevelopment of a sensitive land use or infilling of sensitive land uses within the NEF 30 Contour can occur contingent upon the completion of a detailed noise analysis to determine any necessary noise mitigation measures to be implemented on site. We submit that given the PPS currently allows for sensitive land uses in areas exceeding NEF 30, general development of sensitive land uses should also be permitted under the same criteria within proposed Policy 3.4.2(b).

Further, municipalities currently have the ability to establish stricter requirements with regards to the NEF limit for the development of sensitive land uses. We recommend that the PPS prohibit municipalities from being more restrictive than the NEF 30 Contour lines for sensitive land uses as shown in Policy 3.4.3 below, as it limits housing supply contrary to the objectives of the *More Homes Built Faster Act*. Additionally, this change will ensure municipalities are aligned with the Ministry of Environment direction to permit sensitive land uses up to the NEF 30 Contour. This type of municipal prohibition would ensure local policy is consistent with the Provincial policy, ensuring a united approach to noise regulation across all jurisdictions.

We further recommend that, to encourage housing supply options, the update to Policy 3.4.2(b) should include general development in areas exceeding 30 NEF, conditional upon the completion of a detailed noise analysis to determine the potential for actual adverse noise impacts and recommend appropriate mitigation measures to be implemented in response. These recommended revisions to the proposed Provincial Planning Statement have been outlined below in blue:


*Policy 3.4.2 - Airports shall be protected from incompatible land uses and development by:*

- a) *prohibiting new residential development and other sensitive land uses in areas near airports above 30 NEF/NEP;*
- b) *considering **development of new sensitive land uses or redevelopment of existing residential uses and other sensitive land uses or infilling of residential and other sensitive land uses in areas above 30 NEF/NEP only if it has been demonstrated that there will be no negative impacts on the long-term function of the airport;***

***Policy 3.4.3 - Planning authorities and decision-makers shall not be more restrictive than the NEF limits established in Policy 3.4.2.***

As proposed, the aforementioned recommendations will strengthen the policy framework to provide clarity of implementation, ensure the goals and objectives of the Province are realized and align with realistic growth and development outcomes. The balance of the proposed PPS contains, in our opinion, an appropriate range of policies to protect the matters of provincial interest while also ensuring sufficient residential development is secured throughout the region.

Kind Regards,  
**UrbanSolutions**



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cc. Whitechurch Landowners Group Inc.