



300 Dufferin Avenue  
P.O. Box 5035  
London, ON  
N6A 4L9

May 8, 2024  
Ministry of Municipal Affairs and Housing  
13<sup>th</sup> Floor, 77 Bay Street  
Toronto, ON M7A 2J3

**Re: City of London Planning and Development Staff Comments on Draft  
2024 Provincial Planning Statement  
ERO number: 019-8462**

The City of London Planning and Development staff appreciates the opportunity to comment again on a new proposed Provincial Planning Statement (2024 draft PPS). We also appreciate a number of changes that have been made since the first draft was released in 2023. These changes address some of the concerns we and other municipalities had identified and will help with the implementation of the new policy direction.

We at the City of London support the Province's commitment to a province-wide planning policy framework to manage growth and support housing supply, and we hope that the comments contained in this letter will be received as constructive feedback intended to ensure the policy framework works to achieve those desired outcomes.

This letter identifies some concerns that remain with the draft 2024 PPS and includes recommendations for how they could be resolved through minor revisions. The three main concerns within the draft 2024 PPS include policies related to the planning horizon and growth forecasts, settlement area expansion, and employment lands. Specific recommendations are provided for individual policies within the draft 2024 PPS that would address these concerns.

### **Planning Horizon and Growth Forecasts**

We are pleased to see that an upper limit on the planning horizon for municipal official plans has been reinstated, and that flexibility has been provided through a 20 to 30-year range. Further, added policy language clarifying that the requirement applies "at the time of creating a new official plan and each official plan update" is helpful to set expectations among land owners.

A new area of concern is the added requirement to base municipal growth forecasts on the Ministry of Finance (MOF) 25-year projections. The City of London is currently undertaking an official plan review under section 26 of the *Planning Act* and is expecting the first phase to be presented at City Council in June, 2024.

While we are preparing to apply the MOF projections for our planning process, much more transparency should be provided regarding the methodology that is applied by the MOF when developing population projections.

Between the 2022 and 2023 MOF projections the City of London population forecast changed by more than 100,000 people over the 25 year planning horizon (assuming 84% capture of the Middlesex CMA projection). This equates to a need to accommodate 1,000 additional dwelling units per year for 25 years. We in agreement that every effort needs to be made to increase housing supply and are working to achieve our housing target; however, the risks of over-estimating growth are significant, and include implications for development finance, infrastructure planning, protecting valuable agricultural resources, and ensuring compact development patterns that support an appropriate range and mix of uses.

With municipalities being required to base growth forecasts on these projections, the methodology or rationale for major changes to the projections should be explained so that we can have confidence in the forecast rate of growth and mitigate risks.

**Recommendation:**

- Provide detailed information on the methodology used to develop the MOF 25-year projections and ensure they are based on best practices, or alternatively delete policy 2.1.1.

**Settlement Area Expansion**

In response to the 2023 draft PPS City of London staff raised concerns with policy change to allow consideration of settlement area expansions outside of a comprehensive review. The 2024 draft PPS maintains this new approach and does not include any requirements for a municipality to complete a comprehensive review of the official plan.

The proposed test for a settlement boundary expansion includes that the planning authority shall consider “the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses” (section 2.3.2.1. a)). Other policies in the 2024 PPS require that sufficient land shall be made available to accommodate a 20 to 30-year horizon “at the time of creating a new official plan and each official plan update” (Section 2.1.3), and that outside of that major official plan update 2024 PPS requires planning authorities to “maintain at all times the ability to accommodate residential growth for a minimum of 15 years...” (section 2.1.4. a)).

Removing all limits on when an application to expand the settlement area boundary may be submitted will have major implications on municipal planning processes, despite there being no policy basis to support the expansion as long as official plan updates are completed in accordance with the five-year schedule outlined in the *Planning Act* (section 26(1.1)). If a municipality confirms that it has a designated land supply sufficient to accommodate 20-30 years of residential growth, it is highly unlikely that within 5 years that supply will drop below the 15 year threshold that would potentially warrant a privately initiated amendment to expand the boundary.

This change, along with the corresponding change to the *Planning Act* proposed in Bill 185 that allows settlement area boundary changes to be appealed, will result in a tremendous resource need to deal with these applications and appeals with no possibility of success on the part of the applicant.

A better approach would be to maintain the current requirement for settlement areas to be confirmed through city-initiated reviews that include clear, transparent criteria for the direction of any potential settlement area expansion.

**Recommendation:**

- Add a policy within section 2.3.2 that would permit the establishment of new settlement areas and settlement area boundary expansions only through a City-initiated land needs study and not through privately initiated planning applications.

**Employment Land**

Another area of concern that was identified in our letter regarding the 2023 draft PPS was regarding the definition of Employment Lands, as well as the requirements for “lands for employment outside of employment areas.” These concerns remain with the 2024 draft PPS.

Our first concern is that the definition of “employment area” remains too narrow and will not allow for the full range of uses that are appropriate within London’s industrial areas. The list of uses includes “manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities” (section 8). While this list includes the primary industrial activities it does not offer flexibility to consider similar uses that are appropriate for employment areas.

Further, that other parts of the city that are not defined as an *employment area* but rather as “lands for employment” appear to require provisions to permit a mix of land uses including residential. In some areas this is not appropriate as even though a use may be defined as commercial, it is not compatible with residential neighbourhoods and should be allocated to specific areas that avoid conflicts. This category of land use is not contemplated in the 2024 draft PPS; therefore, it is not clear where this land use category will be applied. In addition, “lands for

employment” that are located outside of an *employment area* may not be able to operate as planned for employment uses if residential uses are introduced given separation requirements such as the provincial D-Series guidelines.

Finally, with the removal of the “comprehensive review” process we remain concerned that the City will be inundated with requests for employment land conversion that will lack the full land needs analysis required to determine whether there is a sufficient supply of employment. Employment land conversions should only be allowed through official plan updates pursuant to section 26 of the *Planning Act*.

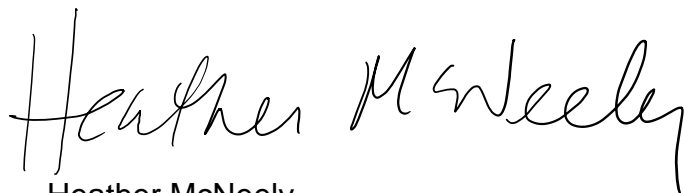
**Recommendation:**

- Amend the definition of “employment area” in Section 8 (definitions) to indicate that the list of uses is not exhaustive. This could be achieved by replacing the word “including” with “such as.”
- Amend policy 2.8.1.3 to allow the local context to be considered when determining permitted uses. This could be achieved by stating that the listed uses “may be permitted.”
- Add a policy in section 2.8.2.5 requiring that employment area conversions may only be permitted through a city-initiated land needs study and not through site-specific planning applications.

**Conclusion**

We appreciate that opportunity to provide feedback on the proposed 2024 PPS and wish to work together with the Province to support growth and accelerate housing development in Ontario. Staff requests that the comments and recommendations provided in this letter, as well as the similar comments submitted by other municipalities, be fully considered and addressed through further changes to the new PPS.

Sincerely,



Heather McNeely  
Director, Planning and Development  
City of London

cc. Scott Mathers, Deputy City Manager, Planning & Economic Development  
Justin Adema, Manager, Long Range Planning