

May 7, 2024

Hon. Paul Calandra
Minister of Municipal Affairs & Housing
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON M7A 2J3

via email: minister.mah@ontario.ca

RE: Cutting Red Tape to Build More Homes Act & the Proposed 2024 Provincial Planning Statement

Dear Minister,

I am writing on behalf of the Council of the County of Middlesex to provide our thoughts on the Cutting Red Tape to Build More Homes Act and the proposed 2024 Provincial Planning Statement (PPS), from the perspective of our rural and small urban communities.

Firstly, I commend the government's initiative to address the housing crisis and the ambitious goal of building 1.5 million homes by 2031. Rural and small urban communities in Ontario face unique challenges in housing affordability, availability, and accessibility. I would note that many rural and small urban communities have demonstrated the ability to provide housing opportunities. According to the 2021 Census, over a five-year period, the County of Middlesex accommodated 9% population growth.

I would like to express our general support of the proposed amendments to the Development Charges Act that would appear to recognize that recent changes were placing financial challenges upon municipalities at the same time that municipalities were being asked to do more. For example, the proposed elimination of the five-year phase in of development charge rates and the potential reinstatement of studies as an eligible capital cost for development charges are welcomed.

The proposed Provincial Planning Statement, providing municipalities with more flexibility, could offer opportunities to create more homes and support local economies in our communities. The proposed PPS acknowledges the need for growth and development beyond major urban centers. Coordination between municipalities and school boards to consider school and childcare needs early in the planning process is also an essential consideration, which will contribute to the quality of place for families moving to new housing.

I was pleased to learn that the Province reconsidered the 2023 proposal to allow residential lot creation within prime agricultural areas. Instead, the PPS would allow flexibility for on-farm housing by enabling additional residential units. I would be remiss if I did not reiterate that the creation of residential lots across the country-side as previously proposed would have significant impacts on matters of provincial and local interest including agriculture (particularly livestock farming), the availability of mineral aggregate resources close to markets, the provision of municipal services, on the Provincial and County Road networks; and that the resultant scattered residential development could occur at the expense of this growth occurring in our small urban communities.

The second area that I would like to highlight, is the flexibility that would be provided through the proposed specified planning horizon of a minimum of 20-years to a maximum of 30-years. A maximum timeframe for planning for growth and clear justification for settlement expansion is necessary to provide certainty and consistency in planning for growth and infrastructure and other public services such as schools. When municipalities make decisions to expand settlement boundaries, there are many complex factors that must be considered including the ability to cost effectively service the lands.

We do however have concerns regarding the proposed inter-related changes concerning privately initiated expansions of settlement areas as well as proposed changes to the Planning Act that would provide for appeals in this regard. While additional flexibility for municipalities to review and update settlement area boundaries is welcome, we are concerned that the proposed policies will put land speculation ahead of growth management. Settlement expansions should be encouraged where initiated by municipalities or, at a very minimum, a municipality should be able to deny a private proposal to expand a settlement and that decision be un-appealable. If not, it could lead to uncoordinated settlement expansions due to continuous pressure from development proponents to expand in multiple directions.

This would likely result in municipalities unable to complete actual growth planning and infrastructure projects that are necessary to sustainably accommodate growth and build complete communities. The ad-hoc expansion of settlement areas without a fulsome analysis and justification would appear to contradict other provincial and local objectives including efficiently using land and infrastructure; preserving agricultural land; encouraging density, intensification and range of housing; building complete communities etc. Such development may require costly upgrades and expansions of existing infrastructure, placing a heavy financial burden on municipalities.

Along with the proposed changes noted above, the need for adequate provincial funding to support municipal infrastructure projects is crucial to address the housing challenges faced by rural and small urban communities. By ensuring that municipalities have access to sufficient funding and support, the province can facilitate sustainable development and help create complete communities that efficiently utilize land, infrastructure, and public services.

One last point regarding the PPS: there is a proposed policy regarding the coordination of land use planning and planning for housing with Service Managers. It's important to clarify that for Middlesex County, the City of London serves as the Service Manager. We want to ensure that this policy doesn't imply linking land use planning decisions between Middlesex County and the City of London. While we maintain a strong working relationship with London on various mutually beneficial aspects, it's essential to recognize that we are separate municipalities with distinct land use planning and housing requirements.

In conclusion, we appreciate the government's efforts to address the housing crisis and encourage continued collaboration with municipalities, particularly rural and small urban communities. We look forward to further participating in the 30-day consultation on the proposed new Provincial Planning Statement and will actively engage in further discussions to ensure the needs of our communities are met.

Yours truly,



Aina DeViet
Warden, Middlesex County