

May 2, 2024

The Honourable Paul Calandra
Ministry of Municipal Affairs and Housing
College Park 17th Floor, 777 Bay Street
Toronto, ON M7A 2J3

minister.mah@ontario.ca

RE: **ERO number** 019-8462

Dear Minister Calandra:

Thank you for the opportunity to comment on the proposed Provincial Policy Statement, 2024. We are a small non-profit organization in Northumberland County. Our primary objectives are: to promote affordable housing programs and policies in Northumberland County; to advocate for the inclusion of the range of tiny homes as part of Northumberland County and member municipalities' housing and homelessness strategies and plans and; to develop and build attainable and sustainable housing and rental solutions and micro home communities in Northumberland County.

We are encouraged by the proposed and renewed language in Chapter 2: Building Homes, Sustaining Strong and Competitive Housing. At the core of our work is the promotion of diversifying the affordable housing options and availability in the County. One of our recommendations is to provide illustrative details of what "an appropriate range and mix of housing options and densities" (s. 4) could be in a guideline or appendix to the Provincial Policy Statement, 2024, once approved. We would strongly encourage you to include tiny homes, as auxiliary dwellings, principal dwellings, and micro communities, as part of the appropriate range and mix of housing options and densities.

Although everyone appears to be supportive of tiny homes, when defined as a small complete dwelling with kitchen, bathroom and sleeping area that conforms to all Ontario Building Code and Ontario Fire Code requirements, there is very little activity in the development of tiny homes in Northumberland County or anywhere else in Ontario. Auxiliary dwelling units (ADU) are permitted across Ontario now and many of these could be tiny homes to house extended family members or to provide affordable rental housing. However, the myriad of zoning bylaws and local requirements are daunting for the average person considering building one.

Micro-communities of tiny homes are not permitted in any of the seven lower-tier municipalities in Northumberland County. A communal grouping of six to eight tiny homes on one residential property may not be as "efficient" as a multi-story condominium or rental property, however it may well fit the unmet needs of seniors and youth who want to live in the same area but independently with high accessibility features. The 2021 census showed that close to 30% of the County's population is over 65 and 63% of the County's households are couples without children or persons living alone. Unfortunately, very few of the planned new housing units for development are being geared to affordable smaller or tiny homes.

With respect to proposed 2.2 Housing, the draft language will be quite helpful once definitions are provided. We note that the definition of "affordable housing" is still pending as per the commitment to define it via Bulletin when the November 2022 *Development Charge Act* was introduced. That said, it is encouraging that the proposed PPS will continue to directly state that "all *housing options* required to meet the social, health, economic and well-being requirements

of current and future residents, including *additional needs housing* and needs arising from demographic changes and employment opportunities”.

We again encourage the Ministry to clarify that the “full range of *housing options* including *affordable* housing needs” to include tiny or smaller homes, be they ADUs or micro communities. To that end, there was no explanation as to the removal of the PPS 2020 1.4.3. (f) section “establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and **facilitate compact form**, while maintaining appropriate levels of public health and safety”. To our minds, this section should retain in the proposed 2024 PPS. To remove it could be interpreted as the province moving away from the development of smaller, affordable housing units which seems to be at odds with your strong support of the development of secondary units.


The new section, 2.4.1, with respect to Strategic Growth Areas and the achievement of complete communities is encouraging. We especially are encouraged by the inclusion of section 2. d) that these areas should be planned “to support affordable, accessible and equitable housing”. Even though we do not believe Northumberland County has been deemed a strategic growth area yet, this is set of housing objectives we should all aspire to.

Finally, while we acknowledge that this comment may be beyond the scope of land use, we would like to take this opportunity to note that the “full range of *housing options*” does not only contain different physical configurations of housing, but also a variety of ownership models; and that those ownership models can have as large of an impact on what is built in our communities as land use planning does. It has been generally acknowledged that traditional planning conventions privilege single-family detached dwellings, and the efforts to change that are greatly appreciated; similarly, fee-simple private ownership of land also incentivizes low-density developments, while lesser-utilized ownership structures such as co-operatives, co-ownership, and land- or life-lease developments each incentivize and facilitate different types of development that have important and under-utilized roles in the full spectrum of housing.

Changing land use planning rules, without changing ownership and financing norms, can frustrate the excellent goals of this proposed Provincial Planning Statement. We hope that this PPS be considered by the government as one part of a broader reform that includes reshaping the regulation of how housing is owned and financed, in order to produce more diverse and stable housing markets in the long term.

Thank you for your consideration of our comments and your potential action on them. We look forward to further opportunities to talk and work together to create a full range and mix of affordable housing options.

Best regards



Monika Turner
Chair, Think Tiny Homes Northumberland

cc. Northumberland County

Township of Alnwick/Haldimand
Municipality of Brighton
Town of Cobourg
Township of Cramahe
Township of Hamilton
Municipality of Port Hope
Municipality of Trent Hills

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