

October 17, 2019

Planning Consultation
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON, M5G 2E5

RE: ERO 019-0279 – PROVINCIAL POLICY STATEMENT (PPS) REVIEW & CONSIDERATION OF LAND LEASE

As Canada's leading owner, operator and developer of land lease communities, Parkbridge is encouraged by the Ontario Government's commitment to reviewing the provincial planning regime to ensure that it is up-to-date, eliminates burdensome restrictions on responsible growth, and supports the government's mandate to increase Ontario's housing supply and unlock more housing choices.

Land lease communities are an active and growing homeownership option, particularly outside the GTA and other large urban centres. Contemporary land lease communities developed by Parkbridge are exceptionally design-built and offer attractive community amenities – while providing the opportunity to purchase a home for approximately 30% less than a comparable freehold home in the same municipality. That is why land lease is a great home ownership option for middle-income homebuyers, particularly downsizing retirees, first-time homebuyers and young families.



Figure 1. The Village at Bay Moorings, Penetanguishene, ON

We welcome the opportunity to provide our feedback on the government's proposed changes to the PPS, which we have further outlined below. Parkbridge is generally encouraged by the proposed updates and the positive impact they will have to encourage growth and new housing supply. **We are nevertheless concerned that "land lease communities" is omitted from the new proposed definition of "housing options", despite the fact that it currently has its own dedicated section under the *Planning Act* (Section 46).** We strongly encourage the Ministry of Municipal Affairs and Housing to update this proposed definition to appropriately include land lease, which will only further enhance our support for many of the additional changes.

After careful review, we are submitting the following feedback in response to the proposed PPS updates.

Include “land lease communities” within the new proposed definition for “housing options”.



Figure 2. Antrim Glen, Freelon, ON

We welcome the insertion of a new proposed definition under Section 6.0 for “housing options” in the PPS. It appears this section is intended to provide an exhaustive list of housing typologies in Ontario, in order to provide the greatest possible breadth for municipalities in interpreting the housing supply and mix policies included in the document.

It is surprising and concerning that “land lease communities” was not included in this detailed list, while several housing options are listed under this definition

that have relatively little current presence in the Ontario housing market. Land lease communities, including both stick-built and mobile homes, are a well-established part of Ontario’s housing mix, representing tens of thousands of existing homes. **As noted, they are already subject to some unique legislative requirements under their own section of the *Planning Act* (Section 46).** To be truly comprehensive, it is imperative that the final definition is updated to include land lease communities. This will make it clear that land lease communities are appropriately included in any interpretation of the relevant policies in the PPS. It will also prevent any confusion with similarly-named but fundamentally different and non-interchangeable housing options already included in the draft definition: “life lease” and “community land trusts”.

Consistently use the term “housing options” where appropriate in the PPS.

As a general rule, we recommend that the term “housing options” be used consistently in the PPS to describe the need to plan for a range of housing choices, options and residential types. This will reduce any possibility of confusion or conflicting interpretations, particularly where the PPS references several specific residential types when the overall definition would be most appropriate.

Specifically, a recommended change of this type is found under Section 1.1.1, in which the current reference to “mix of residential types” – not defined under Section 6.0 – should be replaced by the defined term “housing options”.

Maintain proposed changes supporting greater flexibility for municipal planning and independence to support locally-responsive growth.

Parkbridge supports the proposed updates to the PPS that provide clear policy direction to municipalities to consider additional factors when undertaking their municipal residential planning, including:

- Recognizing the interrelationship between housing, employment, and economic development, and the need for a range of housing options to address these (Section 1.3, 1.4);
- Permitting the consideration of market demand as part of the municipal justification for settlement boundary expansion at the time of a comprehensive review (Section 1.1.3.8);
- Directing municipalities to undertake specific actions to expedite and streamline the municipal planning approval process (Section 4.7)

Parkbridge looks forward to continuing its ongoing discussions with the Ministry of Municipal Affairs and Housing to ensure that proposed legislative, regulatory and policy changes reflect the unique considerations and needs of land lease communities and homeowners. We are available at your convenience to discuss this submission further, and welcome your support for a provincial planning regime that will ensure the continuing growth and expansion of land lease as an attainable home ownership option for thousands more Ontarians.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Voigt'.

Robert Voigt, RPP MCIP

Director of Planning