

November 17, 2022

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Flr, 777 Bay St
Toronto, ON M7A 2J3
Canada



Submitted electronically - growthplanning@ontario.ca

Re: More Homes, Built Faster Act – Review of A Place to Grow and Provincial Policy Statement

The Residential Construction Council of Ontario (RESCON) is Ontario's leading association of professional residential builders. We are committed to providing leadership and fostering innovation in the industry. Our members build the communities and homes of the future. Thank you for this opportunity to provide input with respect to the recent announcement regarding significant changes to planning and housing development policies across Ontario.

The introduction and anticipated passage of the More Homes, Built Faster Act provides a once in a generation opportunity to advance planning regulations, oversight and processes in a manner that has the potential to significantly contribute to efforts to address the housing supply and affordability crisis ongoing in the province of Ontario and in particular within the Golden Horseshoe/Greater Toronto Hamilton Area.

We are pleased to see, and fully support, the stated intent of the More Homes, Built Faster Act with respect to addressing the enduring and increasingly more problematic impacts of the Provincial Policy Statement as well as the Place to Grow Growth Plan for the Greater Golden Horseshoe.

While both the Provincial Policy Statement and the Place to Grow Growth Plan sought to enunciate the provincial government's policies with respect to land use planning across Ontario, their combined stated aims of creating stronger communities that are economically sustainable, affordable and environmentally sound has not materialized to the extent required, and the burdensome weight of complicated and often contradictory interpretations of these policy documents has created a substantial and abiding challenge to residential housing development.

Irrespective of amendments and initiatives to update these policy documents since their inception, in practice the challenges associated with these two parallel planning directives creates confusion and adds unnecessary complications with respect to residential development. With the Provincial Policy Statement securing its authority from the Planning Act and the Places to Grow Act (2005) providing the mandated directions as a standalone legislative act, there is an abiding need to reconcile these two streams of planning policy.

In this regard, the RESCON welcomes the provincial government's proposal, as enshrined within the More Homes, Built Faster Act, to integrate both the Provincial Policy Statement and the Place to Grow Act within one province-wide planning instrument.

The stated aim of the new comprehensive strategy is to identify policies that support housing development within the existing two planning instruments and to have these reconciled within the combined initiative.

Additionally, in seeking to streamline policies and processes, the elimination of burdensome duplication is a necessary approach as is the availability of the planning tools necessary to address supply as well as the demand for reasonable housing mix.



In respect of the latter point, we are encouraged to see that a suitable goal of providing a mix of housing supply that responds to actual housing demand is an identified target of the new planning instrument. While density is of course a necessity of any strategy to meet the substantial demand for affordable housing supply, it is also essential that housing supply recognize that all forms of housing, including ground level housing, must be constructed if realistic housing supply equilibrium is to be attained.

It is also incumbent upon any planning policy instrument that environmental protection, and measures to address climate change, is considered within reasonable and attainable parameters. Unnecessarily complicated and unrealistic sustainable development goals do nothing to assure the availability of needed affordable housing supply, nor do they provide objectives that are implementable or enduring. It is not irreconcilable that substantial increases in residential construction supply in all forms can occur in a manner compatible with sustainable development. We support and advocate for province-wide, consistent and practical requirements of the Ontario Building Code that is advancing sustainability requirements through the ongoing national code harmonization process under the Reconciliation Agreement on Construction Codes, while ensuring that our growing population has comfortable, affordable and sustainable places to live.

Likewise, RESCON strongly supports the stated goal of the proposed legislation that requires suitable community infrastructure to be constructed in a manner that is expeditious and satisfactory in order to meet the demands of the new residential housing supply that the More Homes, Built Faster Act seeks to encourage and deliver.

The More Homes, Built Faster Act consultation document seeks input on specific goals of this significant advance in planning policy for the province and we indicate our positions below on these identified areas.

Residential Land Supply

1. Settlement Area Boundary Expansions – We fully support the “streamlined and simplified policy direction” that provides Ontario’s municipalities the flexibility to respond to housing supply demand including with respect to the permission to expand settlement area boundaries.
2. Rural Housing – While we recognize the concerns with respect to residential development in rural communities across the province, we also support the policy direction that permits more flexible approaches within rural areas of Ontario that are reasonable and compatible with these municipalities and regions and their growth pressures.
3. Employment Area Conversions – The importance of protecting legitimate employment areas is accepted and supported by RESCON. However, within the context of new and rapidly evolving workplaces and contemporary live/work environments, it simply defies logic to have in place rigid and unimpeachable planning policies that preclude residential development in employment areas where appropriate. We support a much-enhanced flexible approach to residential development in employment areas and additionally request that refusals for reasonable conversion requests be permitted for appeal at the Ontario Land Tribunal. It is our hope that through the development of regulations associated with the Act this latter recommendation will also be incorporated.

Attainable Housing Supply and Mix



1. Housing Mix – It is absolutely imperative that the new province-wide planning policy address the need for a range of housing options and densities. All forms of housing as noted in the consultation document must be incorporated within the new policy. While densification is a critical part of the solution to Ontario’s housing supply and affordability crisis, it cannot be successfully addressed if ground-related housing in all forms is not a component of the solution. Likewise, increased density in areas of unreasonable and simply unacceptable restrictive zoning areas must also be permitted as of right. It is critical that the new policy recognize that localized resistance to densification and varied housing options is no longer tolerable if we are to address our housing supply and affordability crisis.
2. Major Transit Station Areas – We fully support and encourage minimum density targets for major transit areas as enunciated in the consultation document. It is incomprehensible that significant and long-term investment in rapid public transit could be envisioned to occur without maximizing to the fullest level the ability to construct densified residential housing in these areas.
3. Urban Growth Centres – It is both sensible and desirable that municipalities be invested with the authority to designate “urban growth centres” where maximum development, both commercial and residential can occur.

Growth Management

1. Population and Employment Forecasts – The federal government has recently announced immigration targets in the range of 500,000 newcomers per year. The vast majority of these new immigrants to Canada, which our country desperately needs, will locate to municipalities in southern Ontario and it is for this reason that we fully endorse the ability of cities and towns to use updated and accurate data when developing planning policies. In fact, we believe it should be mandatory to do so.
2. Intensification – The significant intensification of residential housing construction along transit corridors and in major transit hubs must occur. This intensification is not only reasonable and sensible, but also a critical component of any strategy to meet housing supply and affordability targets.
3. Large and Fast-Growing Municipalities – The implementation of growth management policies to all municipalities across Ontario that are experiencing significant growth, both potential and currently occurring, should take place expeditiously.

Environment and Natural Resources

1. Agriculture – The current events taking place across the world demonstrates the critical importance of the agricultural sector in Ontario with respect to food production. We support measures to protect these invaluable assets but also align with the vision that reasonable residential development and continued agricultural production are not mutually exclusive.
2. Natural Heritage – Province-wide standards that are reasonable and sustainable with respect to natural heritage are necessary but should be implemented within the context that impacts from residential development can in most cases be mitigated with sound policies.
3. Natural and Human-Made Hazards – Any effort to streamline and clarify policies in association with appropriate protections is wise and prudent.



4. **Aggregates** – Access and appropriate supply of aggregates is an enduring challenge within the residential construction sector. In this context, any measures to assist in this regard are supported as enunciated within the consultation document.
5. **Cultural Heritage** – The protection of legitimate and reasonable cultural heritage across the province is worthy of support. However, recent history has demonstrated that often the premise of “cultural heritage” and “historically important” buildings and landmarks has actually been activated with the thinly veiled goal of preventing residential housing densification in given communities. It is crucial that mechanisms, including recourse to the Ontario Land Tribunal in an expeditious manner, be in place to prevent unreasonable and obstructionist misappropriated heritage assertions that impede much needed residential construction. Due to the intrinsically challenging nature of locally devised policies in this regard, it is advisable that these revised policies be exclusively developed and directed to municipalities by the province.

Community Infrastructure

1. **Community Infrastructure** – Residential development and a fulsome effort to address the housing supply and affordability crisis will not succeed without having in place the required supporting infrastructure. In this respect, it is imperative that municipalities develop quickly and implement rapidly any required infrastructure development needed to support housing construction. It is also necessary and advisable that municipalities create an infrastructure dashboard that potential residential home builders can access to determine the best locations (i.e. areas with the best in place supporting infrastructure) to expeditiously activate housing projects in all forms.
2. **School Capacity** – If we are to successfully encourage young families to identify and locate to residential communities, school capacity must exist. While affordability and supply are prevailing issues in terms of the housing crisis, in almost any matrix the need to encourage younger families to locate within new and evolving communities is critical from a housing, economic development and liveable community perspective. We support the province’s directive that an urban school’s framework be instituted for quickly developing communities.

Streamlined Planning Framework

1. **Outcomes Focused** – The need for streamlined planning frameworks has been identified by the residential construction sector for many years. Countless studies, unnecessary delays and cumbersome bureaucratic processes all contribute to the housing crisis. A fully outcome-focused approach is not only desired but essential for successful housing capacity realization and it is supported without reservation.
2. **Relevance** – Suitable, practical and reasonable land use policies are crucial and must be focused on the one ultimate goal of facilitating the maximum amount of affordable housing supply in all forms. We support the intended efforts of this bill and the references in the consultation paper to address these concerns.
3. **Speed and Flexibility** – A fulsome reduction in terms of unnecessary complexity with respect to planning processes and fully embracing innovative planning mechanisms and modern technologies is critical to addressing the speed and flexibility of the system to respond to the housing crisis. We have been advocating for many years that action be taken in this regard and fully support all efforts within the bill,

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and otherwise, to establish and implement the needed process changes, modernization and digitization of the planning system.

In terms of the overall, and specific notations outlined above, it is critical that expeditious and measurable action be undertaken to address the housing affordability and supply crisis.

For too long, successive governments at all levels have failed to undertake the substantive and frankly difficult measures required to realize results in terms of resolving our housing crisis. We congratulate and fully support the expansive and courageous undertakings made by this Ontario Government as manifested in multiple housing initiatives, including or perhaps most notably in the context of the More Homes, Built Faster Act.

We encourage the government to advance quickly on implementation and strongly assert that municipalities work in collaboration with the stated goals of the More Homes, Built Faster Act. We also ask that the provincial government consider, within the context of the major changes to the Provincial Policy Statement and the Places to Grow Act, the process requirements referenced to some extent above.

We would recommend that they support in this regard an expanded pilot of the One Ontario platform currently commencing in Simcoe County and consider that this be introduced and funded for the City of Toronto as they develop their new Development and Growth Division and seek to resolve process challenges.

The significant changes proposed by the More Homes, Built Faster Act with respect to the Provincial Policy Statement and the Places to Grow Act, is a generational opportunity to re-frame Ontario planning policy within a singular province-wide document that will ensure that the construction of residential housing is made less burdensome and more efficient. In this context we fully support this important provision of the Act.

Yours truly,

Richard Lyall
President
Residential Construction Council of Ontario