



Greater Ottawa Home Builders' Association
Association des constructeurs d'habitations d'Ottawa

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December 23, 2022

The Hon. Steve Clark
Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Floor, 777 Bay St
Toronto, ON M7A 2J3

Re: ERO# 019-6177 Review of A Place to Grow and Provincial Policy Statement

Dear Minister Clark,

Please accept the below from the Greater Ottawa Home Builders' Association (GOHBA) and its members as a submission to the government's request for feedback on Review of A Place to Grow and Provincial Policy Statement (ERO# 019-6177).

GOHBA is supportive of the government's efforts to address our housing affordability and supply crisis by establishing a more streamlined approach to planning in Ontario that is outcome-focused, relevant, and promotes speed and flexibility.

Of course, consolidating the PPS and the Growth Plan into a singular planning policy document is a significant undertaking, and requires careful consideration of which policies in the Growth Plan are region-specific and may be not be suitable in a province-wide instrument.

Consultation will need to extend to aspects previously contained in the Growth Plan, like the determination of delineated built-up areas, which will now be relevant to other municipalities, including Ottawa.

We provide comments and additional suggestions on ERO #019-6177's specific proposals below.

1. Residential Land Supply

1.1 Settlement Area Boundary Expansions – streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth

GOHBA supports the broad goal of streamlining and simplifying policy directions to allow municipalities to expand their settlement area boundaries. Both the PPS and the Growth Plan currently contain policies which prohibit settlement area boundary expansions and adjustments

outside of a comprehensive review, with limited exceptions. The definition of comprehensive review is more prescribed in the PPS, containing specific requirements of what the official plan review or official plan amendment must consider. We recommend that the definition and scope of a comprehensive review is given a more flexible approach, as seen in the Growth Plan.

Settlement Area Boundary Expansions should be permitted in advance of a comprehensive review without a limitation as to the size as currently contained in the Growth Plan. The new policy should also promote the use of alternative servicing solutions to permit development in areas where typical full municipal servicing solutions are not viable.

The consolidation of the PPS and the Growth Plan will necessarily result in a singular definition of “comprehensive review”. Conducting a comprehensive review is currently a prerequisite in the policies for decisions including the identification of settlement areas, expansion of settlement area boundaries, and conversion of employment areas to non-employment areas.

Exceptions to the prerequisite for a comprehensive review, as listed in Policy 1.1.3.9 of the PPS, should be maintained.

GOHBA is supportive of having a simplified, flexible definition and scope of comprehensive review that enables a straightforward approach to assessing land needs, facilitating an increase in housing supply.

All municipalities should identify primary settlement areas where the majority of new growth should be focused. These settlement areas should be identified where there is existing or planned municipal water and wastewater systems and where they can support the achievement of complete communities. With primary settlement areas, municipalities should identify strategic growth areas on lands along major roads and areas served by frequent transit as a focus for accommodating higher-density mixes uses. Municipalities will need establish minimum housing and employment targets to achieve a complete range and mix of uses and minimum densities and heights in these areas.

All municipalities should be required to plan for sufficient land to meet a 30-year planning horizon with sufficient supply of a mix and range of housing by unit type through an updated Province-wide land needs assessment methodology. The province should amend the Land Needs Assessment Methodology (2020) to standardize the document as a Province-wide document, differentiating between larger and smaller municipalities.

Municipalities should be required to undertake long-range master planning of infrastructure to at least a 50-year time horizon. This should include long-range land use planning that identifies future growth areas in a long-term urban structure plan to accommodate growth beyond the 30-year planning horizon. Municipalities should establish phasing policies linked to the cost effective and efficient extension of services to guide future settlement expansions.

We would also note that considerations and decisions about infrastructure capacity have become extremely politicized. The province could remove political considerations in infrastructure planning by:

- Requiring that Secondary Plans be completed with over-sized and over-depth infrastructure to ensure that the next development ‘to add on’ isn’t stuck trying to increase capacity for future growth.
- Encouraging municipalities that are undertaking a capacity analysis with a view to upgrading service infrastructure should be encouraged to look beyond the planning horizon in their analysis - this will help avoid having to re-do detailed Ministry of the Environment studies every time the municipality wants to upgrade.
- Encouraging municipalities to place infrastructure outside of urban boundaries to make better use of net-to-gross use of urbanized lands.
- Eliminating MOE Risk Assessments on neighbouring lands that are not the cause of contamination.
- Giving consideration to the creation of a provincial government-run low interest ‘bank’ that would allow land developers or municipalities to borrow funds for infrastructure that needs to be completed to ‘front end’ developments. The loans would then be paid back through development charges (this ‘infrastructure bank’ would make money for the province as invests in growth).

1.2 Rural Housing – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas

GOHBA supports policy directions that respond to local circumstances and provides increased flexibility to enable more residential development in rural areas. Removal of the requirements of a municipal comprehensive review under the Growth Plan for minor changes to the boundaries of rural settlements is recommended, given the existing policy protections in the PPS (including restrictions for prime agricultural areas, etc.).

1.3 Employment Area Conversions – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate

GOHBA supports the development of mixed-use land designations to increase housing supply, but we also suggest that employment projections be closely scrutinized related to employment/mixed use areas (E/MUA’s). It will be important for municipalities to ensure that adequate land supply is provided for employment. At the same time, the E/MUA’s will provide intensification opportunities where in the past employment lands tended to be underutilized and at lower densities.

In regards to this, further clarification will need to be provided in regards to the identification of provincially significant employment zones, as referenced in the Growth Plan. Policy 2.2.5.12 of the Growth Plan provides that the Minister “may identify provincially significant employment zones and may provide specific direction for planning in those areas to be implemented through appropriate official plan policies and designations and economic development strategies”.

If there are going to be distinctions in provincial-wide policies between conversions of employment areas and provincially significant employment zones, more clarity is required regarding what factors are significant. All stakeholders will benefit from clarity regarding which lands within employment areas can be converted to new residential and mixed-use development, where appropriate.

2. Attainable Housing Supply and Mix

2.1 Housing Mix – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs

GOHBA supports this policy direction as our fundamental concern is housing supply and housing affordability.

Our experience with the City of Ottawa’s new Official Plan is that it does not recognize the cumulative impact of its policies or how the development requirements it imposes work against being able to provide housing that is affordable. In fact, it acknowledges that some of its policies will increase the cost of housing.

GOHBA estimates the cumulative cost of Ottawa’s new Official Plan policies could add between \$58,450 and \$107,000 to each new home. Additionally, Inclusionary Zoning and Community Benefits Charge Bylaws will apply in Hubs, where most of the 1- and 2-bedroom dwelling units are slated to be built.

Therefore these new homes – the ones that are supposed to be most affordable - are going to bear the brunt of a series of policies that will build up on top of each other. This will make it extremely challenging to provide housing affordability for the 30th-50th percentile.

In order to protect housing affordability across the province moving forward, it should be required that Official Plans recognize housing affordability as a goal, and that OP policies and/or development application requirements be considered through a housing affordability lens.

Related to recognizing housing supply and affordability as goals of planning, the province needs to enforce the requirement of Section 1.1.1.b of the PPS to have a market-based supply of

housing and mix of housing options (including single-detached, semi-detached and row housing) to meet the projected market-based needs of current and future residents.

Further, there needs to be clarification in the PPS that growth management strategies to support OP updates or major OPAs must include consideration for past land use needs. Future land use needs have to be tethered to past demand, and only moderate adjustments to demand for housing typologies can be made.

This should help address the disconnect between the desire for low rise, wood frame housing options as measured against the demand for condominium housing.

It is important that the projections undertaken by municipalities are grounded in real time data and evidence. It is also important that a new PPS speak to the need for municipalities to address age specific propensities that would occupy housing by type.

Generally, current population forecasts have assumed that the aging population is downsizing and occupying smaller homes. In reality, a significant portion of this age group is remaining in their family homes, thereby reducing the turnover rate.

Household formation rates by age and by size are key to determining the necessary future housing mix and therefore the types of housing that will be required going forward.

At the same time, other market factors that also may be important, including age characteristics, family status, and economic circumstances of the population. These factors, while not determinative, may provide indication of a need for further housing in the future, which population statistics do not capture.

The proposed new policy instrument should include these considerations in its overall approach to achieving efficient and resilient development and land use patterns.

GOHBA recommends that population and employment forecasts be a mandatory factor in determining additional housing, with other discretionary factors considered to justify further additions.

Finally, GOHBA also recommends that the definition of affordable housing in the new policy instrument aligns and mirrors the statutory definition of affordable housing units in section 41 of the *Development Charges Act*, added as a result of Bill 23.

2.2 Major Transit Station Areas – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario

GOHBA supports this policy direction and the mandating of updated zoning for PMTSAs within a year of designation, as already prescribed by Bill 23.

Municipalities should also identify Major Transit Station Areas (MTSA) within 800m of stations or stops on planned or existing higher-order transit routes and Urban Growth Centres (UGC).

Moreover, the province should establish guidance material for a typology of MTSA and UGCs, identifying the minimum heights and densities that could be planned in relation to varying surrounding urban development and the form of transit service. Municipalities must plan for transit supportive density focused on MTSA and UGCs with minimum height and density permissions, and where maximum heights or densities should be discouraged.

2.3 Urban Growth Centres – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur

GOHBA supports intensification in strategic areas, including major transit station areas and growth areas. The implementation of minimum density targets, such as those in Policy 2.2.3.2 of the Growth Plan, require analysis of different regions in the Province, and their unique characteristics. In other words, the approach cannot be one size fits all. Existing policies requiring a coordinated, integrated and comprehensive approach when dealing with planning matters should be maintained.

In regards to intensification, GOHBA recommends that the new policy instrument specifically define what “strategic areas” are subject to proposed policy directions to increase housing supply. GOHBA supports focus on transit corridors and major transit station areas, but notes that other fully serviced areas will benefit from development (such as settlement areas along highways or major roads, existing or planned public spaces, etc.).

3. Growth Management

3.1 Population and Employment Forecasts – policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment

GOHBA supports the provincial government's establishment of a goal to build, over the next decade, 1.5 million new homes across the province, which also fulfills Ontario Housing Affordability Task Force Recommendation #1 (*Set a goal of building 1.5 million new homes in ten years*).

GOHBA also supports the setting of housing supply targets for municipalities – in the case of Ottawa 151,000 new homes over the next ten years. This is necessary as it focuses a municipality's housing policies, zoning and other actions on a specific, measurable goal.

In addition to setting municipal housing supply targets, we would urge the provincial government to standardize municipal population, employment and housing growth forecasts by using Ministry of Finance projections. This would fulfill Ontario Housing Affordability Task Force Recommendation #51 (*Require municipalities and the provincial government to use the Ministry of Finance population projections as the basis for housing need analysis and related land use requirements*).

The first exercise municipalities undertake to update their planning regimes is to update their growth projections. Growth projections lay out the expected increases in population, households, housing needs and employment over the horizon of a new Official Plan.

Earlier this year the province undertook a review of its Projection Methodology Guideline (PMG). The fundamental element that must underscore a revised PMG is to allow for local land use needs while ensuring that there is a consistency in the result – that result being an appropriate level of housing supply both in number of dwelling units and mix of housing typologies in which Ontario families want to live (this would also make municipal growth management strategies better align with the province’s goals in the *More Homes, More Choice: Ontario’s Housing Supply Action Plan*).

This would provide a mechanism for the MMAH to ensure that the projections of the provincial growth plan are being met locally, not only from a population forecast perspective but also from a market needs assessment of the type of housing that will be required to accommodate future housing needs.

At the same time, the province needs to require application of a consistent methodology for net-to-gross land use analysis by municipalities, and institute a statutory timeline for updating these analyses in order to monitor how municipalities are utilizing land.

In addition to establishing and then building on top of appropriate growth projections, municipal Official Plans need to update their growth projections a minimum of every five years. In Ottawa, for example, in order to ensure that the Official Plan is fulfilling its obligation to provide a sufficient amount of housing for our population, we need to do more than just check our progress in 2024 against housing targets set in 2019. Our population, household and dwelling projections need to be recalculated as well to ensure that we are working towards the correct goals.

3.2 Intensification – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas

GOHBA supports the policy direction to increase housing supply through intensification in strategic areas within a municipality, but we urge the government to include intensifying low-rise neighbourhoods, where there is significant potential to increase the housing supply, and the greatest structural impediments (eg. zoning) to intensification.

Now is the time to modernize local zoning ordinances. Older neighbourhoods in communities across Ontario are shrinking in population as residents age and children move out.

Low density zoning policies make it virtually impossible to build the “missing middle” types of housing that we need in communities across Ontario to help house the significant population growth expected in the coming decades.

In Ottawa’s built-up area alone:

- 46% of all residential lots are zoned single-detached/Residential First Density (R1);
- Single-detached zoning isn’t spread evenly across the city – 2 per cent of downtown residential lots are zoned R1, increasing to 31 per cent in the inner urban area, 63 per cent in the outer urban area (located inside the greenbelt), and 44 per cent in the suburbs;
- Zoning for semi-detached and rowhomes account for 14% and 29% of residential zoning respectively;
- Only 10% of all residential lots allow more than 3-units per lot.

GOHBA has detailed the barriers to intensification (often municipal policies) in its submission to ERO# 019-6197 (Proposed Changes to Ontario Regulation 299/19: Additional Residential Units).

The proposed policy direction would also fulfill Ontario Housing Affordability Task Force Recommendation #2 (*Amend the Planning Act, Provincial Policy Statement, and Growth Plans to set “growth in the full spectrum of housing supply” and “intensification within existing built-up areas” of municipalities as the most important residential housing priorities in the mandate and purpose*).

Further, eliminating exclusionary single-detached zoning everywhere, including suburbs, would fulfill the Ontario Housing Affordability Task Force Recommendation #3 (*Limit exclusionary zoning in municipalities through binding provincial action*).

3.3 Large and Fast-growing Municipalities – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit

GOHBA supports this policy direction, as both the PPS and the Growth Plan currently contain policies regarding providing an appropriate range and mix of housing options in the “regional market area”. Regional market area under the PPS, and adapted under the Growth Plan, “refers to an area that has a high degree of social and economic interaction”. The Growth Plan adds that “it may include a combination of upper-, single- and/or lower-tier municipalities”.

Identification of regional market areas will provide more certainty regarding the appropriate range and mix of housing options and densities under Policy 1.4.1 and 1.4.3 of the PPS.

4. Environment and Natural Resources

4.1 Agriculture – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations

GOHBA is generally supportive of increased flexibility for residential development outside of prime agricultural areas. We recommend that policies restricting permitted uses and lot creation continue to apply only for prime agricultural areas (i.e. areas where prime agricultural lands predominate). We do not recommend applying the approach in the Growth Plan, which expands policies to the “agricultural system”, mapped and issued by the Province, as per the Greenbelt Plan.

Having a singular definition which identifies significant agricultural areas to be protected, will promote an outcomes-focused approach.

4.2 Natural Heritage – streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting/compensation

GOHBA provided extensive comments on Natural Heritage in its submissions to ERO 019-6160 (Proposed Updates to the Ontario Wetland Evaluation System), ERO 019-6141 (Legislative and regulatory proposals affecting conservation authorities), and ERO 019-6161 (Conserving Ontario’s Natural Heritage).

4.3 Natural and human-made hazards - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk

GOHBA provided extensive comments on Natural and human-made hazards in its submission to ERO 019-2927 (Protection of people and property from natural hazards).

4.4 Aggregates – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed

4.5 Cultural heritage – policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply

GOHBA provided extensive comments on cultural heritage in its submission to ERO 019-6196 (Proposed Changes to the Ontario Heritage Act).

5. Community Infrastructure

GOHBA generally supports policy directions to increase flexibility for servicing new development, and encouraging municipalities to undertake long-range integrated infrastructure planning. More specifics are required to fully evaluate the proposal.

We recommend however that community infrastructure, like schools, should not be limited to high growth communities and urban cores, in order to encourage the supply of housing more broadly throughout the province.

5.1 Infrastructure Supply and Capacity – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning

GOHBA supports the above direction as it fulfills the Ontario Housing Affordability Task Force Recommendation #11 (*Support responsible housing growth on undeveloped land, including outside existing municipal boundaries, by building necessary infrastructure to support higher density housing and complete communities and applying the recommendations of this report to all undeveloped land*).

5.2 School Capacity – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education’s proposal to support the development of an urban schools’ framework for rapidly growing areas

GOHBA supports the above direction as policies regarding publicly funding school facilities are part of an integrated municipal planning approach. Their role in meeting the needs of high growth communities is not currently in the PPS, but is referenced in A Place To Grow.

In addition, however, we would urge the government to look at the issue in the reverse, and mandate intensification in areas with excess school capacity, which are typically older, low-rise neighbourhoods with a city’s core. This would promote the integration of young families into an established neighbourhood, fulfilling the Ontario Housing Affordability Task Force Recommendation #7 (*Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children*).

6. Streamlined Planning Framework

6.1 Outcomes-Focused – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes

6.2 Relevance – streamlined policy direction that focuses on the above-noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests

6.3 Speed and Flexibility – policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier

GOHBA supports the above principles to guide the streamlining of Ontario’s planning framework.

Questions posted for ERO#019-6177

1. What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?

Overall, GOHBA supports the identified proposed core elements, and it does not have an issue with the principals or purpose behind the PPS subject to the specific comments contained herein.

The government should generally maintain the structure and requirements of the Provincial Policy Statement (PPS), with important additional policy directions from selected policies of the Growth Plan.

It is worth considering to keep/maintain area-specific principles (such as those found in the Place to Grow plan) somewhat separated from a successor document to the PPS, and keep that document to policies apply province wide.

Area-specific principles or regional specific targets could be appended to the PPS as separate schedules, or included in a regulation or other document that may be more quickly modified, so it will be better able to respond to changing markets.

As an example of an area-specific principle or target, GOHBA would welcome provincial involvement in setting intensification targets and locations for population and employment as stated in the Place to Grow plan (sections 2.2.2(1) and 5.2.4(7)). Provincial involvement would eliminate the influence of local politics that are sometimes relied on in order to prevent additional intensification. The influence of local politics was apparent in Ottawa when council approved its official plan in 2021, and heights were reduced along minor corridors due to political direction rather than planning staff’s recommendations. Heights were restored by the Minister when the government approved the official plan in November 2022.

2. What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?

First, GOHBA would encourage the government to enact or implement any outstanding recommendations from the Ontario Housing Affordability Task Force in order to increase the supply and diversity in housing.

In addition:

Density Targets

Density targets, such as are currently in the Place to Grow plan, are a good way to direct growth to a specific area/region including stating what is to be excluded (section 2.2.7(3)).

As stated in previous submissions, GOHBA supports the recent *Planning Act* changes that permit three units as of right implemented in the *More Homes Built Faster Act* (Bill 23). Another change that should be made in the Planning Act or PPS would be to state that areas around transit stations are automatically permitted to have higher density. This could be captured in a “Transit Supportive” policy that should be an expansion of PPS policy 1.1.3.3.

In order to ensure that all municipalities plan for their share of growth, the province should continue to issue minimum housing and employment growth forecasts for larger municipalities every 10 years. The forecasts should be for a 30-year time horizon and should account for the municipality’s ability to grow. The development of such forecasts should be done in consultation with the municipalities and the development community to align growth needs and requirements (such as servicing infrastructure.) The new policy document should require municipalities to plan to achieve these targets at a minimum.

Settlement Area Expansions

Additionally, the PPS should permit the expansion of a settlement area outside of a comprehensive review if the expansion is justified. This is appropriate in light of the fact that official plans do not have to be updated for 10 years rather than the previous 5-year time frame. This change could be accommodated by removing PPS policy 1.1.3.9 (a). GOHBA would also encourage the Province to set what criteria are to be considered when assessing a candidate expansion parcel rather than leaving it to the local municipality to decide the criteria. If the province sets the criteria then a more consistent regime will apply across the province.

Protect and Preserve

GOHBA requests that the words “protect and preserve” be removed from PPS policy 1.3.2.1. Employment Areas should be planned for current and future uses but the inclusion of the words “protect and preserve” are often used to prevent a diversified use of lands in employment areas. Ultimately, settlement areas should be vibrant, mixed-use areas. There are instances where it makes sense to locate a particular land use in an employment area due to its land or operational needs, for example an indoor tennis/racquet facility, but the PPS as currently worded is too rigid in its protection of employment lands. Moreover, a conversion only at the time of a comprehensive review (PPS policy 1.3.2.4), or the requirement to demonstrate “an identified need” (PPS policy 1.3.2.5(a)), or ‘feasible’ as stated in the Place to Grow plan section 2.2.8(3), are too restrictive and onerous tests to meet. A planning amendment application should be permitted to be submitted at any time then it will be

through the development approval process that the planning merits of the conversion may be considered.

Agricultural Areas

The policies contained in the PPS 2.3.4 are too restrictive to account for existing residences and farm consolidations. The wording of 2.3.4.1(c) may be amended to clarify that more than one lot may be created, subject to restrictions, for residences surplus to a farming operation. We propose the following language for 2.3.4.1(c):

Lot creation in prime agricultural areas is discouraged and may only be permitted for **existing residences** surplus to farming operation as a result of farm consolidation, provided that:

1. **New lots** will be limited to a minimum size needed to accommodate the use and appropriate sewage and water services;
2. new lots contain an existing habitable dwelling made surplus through farm consolidation;
3. for the first severed lot, the planning authority ensures that new residential dwellings are prohibited on any remnant parcel of farmland created by the severance. The approach used to ensure that no new residential dwellings are permitted on the remnant parcel may be recommended by the Province or based on municipal approaches which achieve the same objective; and
4. for any additional severed lot, the planning authority ensures that new residential dwellings are prohibited on a separate, corresponding parcel(s) of the consolidated farmland holdings. The approach used to ensure that no new residential dwellings are permitted on the separate, corresponding parcel(s) may be recommended by the Province or based on municipal approaches which achieve the same objective.

3. How should the government further streamline land use planning policy to increase the supply of housing?

GOHBA suggests that the PPS is not the document that should be used for this purpose but rather the *Planning Act*, and corresponding regulations, are the tools that should be created for this purpose.

GOHBA is encouraged by the recent changes introduced by the *More Homes Built Faster Act* (Bill 23) and is eagerly awaiting the corresponding/supporting regulations. GOHBA supports the use of regulations set by the Minister as being the tool through which specific situations may be addressed. Regulations may be set, and revised, in a faster and more nimble way than legislation or even provincial policy documents.

As an example, although these are not planning policy, GOHBA feels it is important to highlight a few issues that, if addressed, would substantially help to increase the supply of housing:

Retain Planning Fees in the Department

In order to avoid perpetual fee hikes, it is essential that all fees collected for Planning Services remain in the department, and any operating surplus to be transferred to a reserve fund, as is done with Building Code Services.

This will support three key objectives:

- The department's financial sustainability;
- Consistency of service and performance despite ebbs and flows in the housing market; and,
- Management oversight that increases accountability and transparency.

Building Code Services (BCS) is required to create and maintain a contingency fund with the excess revenue it holds at the end of the year from its fees for service. This allows BCS to maintain their level of service and staffing if there is a period of time where they do not receive their expected fee for service revenues. BCS also has to consider the size of their contingency fund in setting their fee levels for the next year.

The Province should require that municipal Planning Departments change management of their fee for service revenues to retain fees within the department, following the Building Code Services model, which not only ensures that the money is spent for the purpose it was collected for, but would also provide the department with the resources to continue its level of service and staffing in an economic downturn.

Address Issues with the Land Titles Office

Ever since there were changes to the organization of the Land Titles Office administration to centralize operations and responses to concerns and questions, the development industry has experienced processing issues and lengthening timelines to register lands. Contrary to the intent, this has substantially slowed every aspect of the registration system.

A typical subdivision goes through an Application for Absolute Title, registration of a Plan of Subdivision, registration of reference plans for easements and other requirements, the registration, temporary lifting and final lifting of Inhibiting Orders, conveyances and reconveyances of municipal reserves and conveyances to homeowners.

The centralization of Land Titles services has slowed this entire process down, and made dealing with issues nearly impossible, as officials processing files do not have local knowledge, and there is no consistency in processing from file to file.

This has negative implications for the delivery and cost of housing.

The province needs to devote more resources to the Land Titles Office, set a consistent process for registering lands, and re-designate local officials to process local files.

4. What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?

As mentioned above, GOHBA would welcome provincial involvement as the approval authority, or being the leader, in setting intensification targets and locations for housing and employment. This would be similar to the Place to Grow plan that states (2.2.1(5)) the “Minister will establish a methodology for assessing land needs to implement” the plan.

GOHBA would also like to see provincial targets that identify transit stations where intensification is to occur as well as “*provincially significant employment zones*” as defined in the Place to Grow plan. *Provincially significant employment zones* is a principle that should be applied across the province. The statements contained in the Growth Plan section 2.2.4(9), transit stations, are helpful and should be applied province-wide.

The Place to Grow plan section 2.2.5(17) speaks to regional planning across boundaries. GOHBA recommends that this is a principle that should be applied in the National Capital Region between Ottawa and the city of Gatineau in Quebec.

The Designated Greenfield Area policies in the Place to Grow plan (section 2.2.7) are good and should be included in the PPS. GOHBA encourages the Province to direct municipalities to appropriately designate and zone designated greenfield areas so development may occur in a more expeditious and cost effective manner.

The following policies contained in the Place to Grow plan should also be included in a new PPS:

- (a) 3.2.1- The provision of infrastructure should be coordinated so areas where intensification and growth is to occur will be serviced in a timely manner. Municipalities should also be required to construct infrastructure in a timely manner unlike the current system where it is not known when infrastructure will be constructed, and it is even possible for municipalities to defer construction;
- (b) 3.2.3(2) is a policy that should also be contained in the PPS.

5. What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?

GOHBA recommends that words should have the same meaning regardless of which provincial policy or plan it is used in; this would eliminate confusion and would facilitate a more consistent application. We note section 1.2.3 of the Place to Grow plan uses “will” and “shall” interchangeably whereas “will” is used elsewhere. Will is the term that should be used consistently.

The Place to Grow plan states, in policies 2.2.1(2)(a) and 2.2.2, that growth will be directed to settlement areas that have a “delineated built boundary”. GOHBA suggests that the words “delineated built boundary” should be removed and not included in the PPS or a growth plan. A settlement area boundary is as defined in planning documents regardless of whether the area is a ‘built boundary’.

GOHBA requests that a growth plan should be clear and indicate what targets are applicable and where. It appears that the Place to Grow plan contains targets but then also permits deviations (section 2.2.4(4)) which creates a lack of clarity and confusion.

GOHBA does not agree with the inclusion of connectivity policies or set distances for connectivity in the PPS as is stated in the Place to Grow plan (section 4.2.2(3)(a)(ii)). The determination of what is an appropriate connection or distance should be determined on site rather than being directed by a number in a provincial plan. The policies contained in section 4.2.2(3) of the Place to Grow plan are very prescriptive and should not be applied province wide.

The requirement to provide or use lot-level stormwater control (Place to Grow plan 4.2.4(5)(c)(vi)) needs to be further considered being applied province wide. It is often not feasible, financially or due to the site area, to provide lot-level stormwater control on intensification sites.

GOHBA does not agree that a provincial policy or plan should prescribe any details associated with an aggregate rehabilitation plan (section 4.2.8 and specifically the statement that 35% of the site should be forest cover). Each rehabilitation plan should be determined based on the site-specific details.

The government should consider removing many of the growth management policies that seek to restrict the supply and type of housing. Policies contained in sections 2.2.7 (Designated Greenfield Areas) and 2.2.8 (Settlement Area Boundary Expansions) go well beyond the PPS in requiring extensive studies and analyses prior to allowing any new housing in growth areas. The policies of these sections have had the effect of adding years to the planning process that have delayed new lands being developed for housing. In particular, the measurement of gross density on the basis of residents and jobs per hectare does not readily translate into clear concepts of community form and is therefore not an outcome-based policy. These policies should be discontinued in the new policy document.

The policies of section 4 of the Growth Plan largely duplicate and add additional requirements to those found in section 2.0 of the PPS. We believe that the policy approach and details in the PPS is sufficient to provide guidance on these matters, and the policies of the Growth Plan should not be maintained in a Provincial-wide document, including as it would apply to the Greater Golden Horseshoe. The policies of the PPS should be maintained rather than those of Section 4 of the Growth Plan.

The policy vehicle for municipal implementation of settlement area boundary expansion, employment conversion, and implementation of Provincial Plans should be the Comprehensive Review as described in the PPS. References to a “Municipal Comprehensive Review” and the associated definitions in the Growth Plan should be discontinued.

Conclusion

GOHBA is in support of creating a streamlined province-wide land use planning policy instrument. As the Province has not yet released proposed wordings of revisions, uncertainty remains regarding how policy directions will be streamlined and simplified.

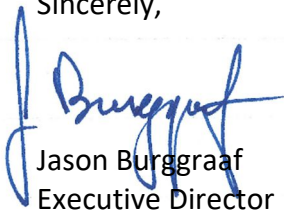
In general, the existing provisions in the PPS are housing-focused, and GOHBA recommends it become the starting point for the Province’s review. As the policies in the Growth Plan are focused on the Golden Horseshoe region, there is a risk that adopting that approach in a broader policy will create a patchwork of requirements depending on geographic location.

Finally, transitional provisions should be included to allow all stakeholders to properly implement new policies.

Thank you for the opportunity to provide comments on this proposal. We look forward to further consultations.

We are pleased to answer questions or provide further information as requested.

Sincerely,



Jason Burggraaf
Executive Director