**PROVINCIAL POLICY STATEMENT**

On behalf of the County of Middlesex, I thank you for the opportunity to provide input on the proposed More Homes Built Faster Act and related Provincial changes. This submission relates to the proposed changes to the Provincial Policy Statement (PPS) and A Place to Grow.

It is acknowledged that the provision of housing is important and that municipalities play a key role in increasing the supply of housing while building complete and sustainable communities. Even a few years ago the question of housing affordability would have been a low priority for our community as this challenge was largely an issue for our large urban neighbour. This is no longer the case as our rural and small urban County has significant housing affordability and attainability challenges that in many respects have outpaced our urban neighbour.

Your Government is undertaking a broad consultation on the Review of A Place to Grow and PPS. This review suggests that the Place to Growth and PPS documents could be combined into one province-wide planning policy instrument. Below are responses to the questions posed in the consultation guideline.

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

**Residential Land Supply**

We recognize that sufficient designated residential land is key in increasing the province’s housing supply. Municipal comprehensive reviews should continue to rely on up-to-date population and employment projections as well as necessary servicing studies to ensure a coordinated, balanced and fiscally responsible approach to land use and infrastructure planning.

Enabling municipalities to expand their settlement area boundaries in response to “changing circumstances, local contexts and market demand” could have different outcomes in different locations. For example, market demand today does not necessarily reflect a community’s true housing needs for today and the future. Municipalities must have the opportunity to set and achieve housing targets through a variety of approaches including intensification and redevelopment and not just through green-field development of single-detached dwellings. This must be undertaken in a manner that also reflects a municipality’s ability to fund and provide necessary infrastructure.

**Attainable Housing Supply and Mix**

Housing is a complex issue that has important implications for local communities and Counties given current growth projections. Land use policies that encourage the provision of housing by enabling the development/redevelopment of a range of housing options, varying in form, type and location are key from an attainability perspective. The County of Middlesex is currently undertaking an ‘Attainable Housing Review’ that examines the Housing Continuum from Emergency Shelter, Short-Term Supportive Housing, Long-term Supportive Housing, Subsidized Rental Housing, Rental Housing and Ownership Housing and identifies gaps in the provision of housing and a corresponding municipal strategy that will comprise a future amendment to the County plan to implement further policy direction in this regard.

Additionally, through the County’s recent official plan review, the Official Plan is proposed to include additional direction to encourage municipalities to promote a high standard of urban design by prioritizing principles such as pedestrianization, compact form, mixed-use, accessibility and universal design, to create healthy vibrant communities which attract investment. The policies would promote and prioritize intensification and redevelopment, a pedestrian and mixed-use focus, and permit individual lot intensification, such as additional residential units, where criteria can be met.

**Growth Management**

Growth management is a topic that was also considered during the County of Middlesex official plan review. Middlesex County has been successful in achieving much greater rates of growth over the past Census period that historic averages. It is projected that this greater rate of growth will continue over the next 25-years. Additional direction through a provincial planning policy or guideline document on how growth should be projected and land needs calculated would be welcome provided that it is supportive of coordination and collaboration between lower and upper-tier municipalities and also recognizes that growth requires corresponding servicing infrastructure.

**Environment and Natural Resources**

From a natural resources perspective, the process by which aggregate extraction operation sites are established could be streamlined. Under the current framework, aggregate extraction operations are required to obtain permits under the Aggregate Resources Act as well as land use planning approvals under the Planning Act. The public process that is required under the Planning Act can lead to delays for aggregate operations given the public’s third-party appeal rights for the required official plan amendments and zoning by-law amendments. A streamlined provincial system to support the establishment of aggregate extraction operations could reduce redundancies within the current system and also reduce aggregate-related planning files, which would allow municipalities more time to dedicate to housing-related planning files.

The protection of prime agricultural land has long been a matter of Provincial interest. The PPS directs municipalities to identify and designate all Prime Agricultural Areas within their jurisdiction. The types and scale of ‘other’ permitted uses in prime agricultural areas has been clarified through the establishment of agriculture-related use and on-farm diversified use policies within the PPS. Being the predominant land use in the County, agriculture is an important component of the economy and culture. Middlesex County’s agricultural lands and agricultural operations are important locally, provincially and nationally.

We recognize that the PPS sets the overall policy direction on matters of provincial interest related to land use planning and development. The PPS provides for growth and development while also seeking to protect resources such as prime agricultural lands and the natural environment. The PPS challenges municipalities to balance competing interests. We hope that any outcome of the review of A Place to Grow and the PPS continues to provide the latitude to municipalities to balance competing interests including the protection of viable agricultural systems while also providing additional opportunities for housing.

**Community Infrastructure**

 In recent years, Middlesex County has worked to develop a close working relationship with our local school boards for the purposes of information sharing to ensure a collaborative approach to land use planning and facilities accommodation planning at the school board. The proposed changes that would facilitate a coordinated approach to ensure publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities are welcome and would likely be supportive of the work that is already being done.

As it relates to the responsibilities of the local municipalities within Middlesex County, it must be noted that rural and small urban municipalities struggle to fund the infrastructure necessary to support growth. Part of the answer might be the continued and focused provincial infrastructure funding for rural and small urban municipalities that are accommodating growth and thereby providing housing choices. The Ministry should exercise caution on any policy direction that would result in municipalities being required to enter into municipal responsibility agreements for private infrastructure.

**Streamlined Planning Framework**

This is an area where we believe that Middlesex County excels. Over the past number of years, we have worked to develop a land use planning policy and process framework that works for our communities and municipalities. This includes a coordinated and streamlined planning process that simultaneously respects decision making authorities of elected councils. To further this, the County of Middlesex in partnership with local municipalities is now implementing a web-based e-planning system and our municipalities and the County have already delegated certain responsibilities to staff.

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

Policies that provide for greater densities and housing types will play a key role in increasing the supply of housing. Providing for municipalities to establish density and intensification targets in official plans would identify up-front to development proponents the types and forms of housing that a local community is seeking. Any such policies must however reflect the difference in scale of smaller urban and rural municipalities.

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

Within the current land use planning framework in Ontario, developers cannot be compelled into building homes and will often bank designated residential land or sit on approved developments due to market conditions. Providing municipalities the ability to issue ‘use it or lose it’ approvals may encourage the building of more homes.

A standardized approach to land needs assessments that is directly tied to infrastructure funding would also assist municipalities in increasing the supply of housing. Standardizing lands needs assessments would likely streamline the comprehensive review process which considers current and future or planned servicing components. Municipalities would be provided with greater certainty in regards to how servicing extensions or upgrades would be funded. This is especially pertinent in rural and small municipalities who are experiencing more growth in recent years as these municipalities sometimes struggle to fund the infrastructure that is necessary to support growth.

1. 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?

Currently, Section 5.2.8 of A Place to Grow contains implementation policies that the PPS does not. More specifically, Policy 4, which encourages the use of deeming by-laws, where applicable, to ensure plans of subdivision meet growth management objectives. The inclusion of similar policies would provide municipalities with the tools to ensure that residential developments meet the current policy framework, which is generally more supportive of a range of densities and housing types. Currently, municipalities outside of the Greater Golden Horseshoe have limited instruments to ensure developments that were approved under past planning regimes adhere to more current policy directives and further support the provision of more housing. This could be related to the previously noted ‘use it or lose’ approach.

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

The Ministry should exercise caution when considering which policy concepts from A Place to Grow should be extended to areas outside of the Greater Golden Horseshoe. More specifically, the excess land policies from A Place to Grow that require the down designating of lands could have implications if extended to slower growth areas in southwestern Ontario. These policies could inadvertently result in the loss of residential growth and development in certain lower-tier municipalities who have had historically lower growth rates than others. Any policies that contemplate excess lands should take a balanced approach to dealing with such so as not to remove designated residential land from a slower growing municipality but also not hinder growth in faster growing municipalities.

It is also noted that this consultation suggests that the Place to Grow and Provincial Policy Statement could be combined into one Province-wide policy statement. It is noted that the more prescriptive approach that A Place to Grow takes is likely not appropriate for relatively lower growth areas like Middlesex County.

Yours truly,



Bill Rayburn

 Chief Administrative Officer