

December 28, 2022

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Dear Minister Clark,

Re: Comments from the City of Greater Sudbury on ERO Posting – 019-6177 – Review of A Place to Grow and Provincial Policy Statement

The Ministry of Municipal Affairs and Housing (MMAH) is undertaking a housing-focused policy review of the Provincial Policy Statement, 2020 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow). MMAH is seeking input on how to create a streamlined province-wide land use planning policy framework that enables municipalities to approve housing faster and increase housing supply. The City of Greater Sudbury (the City) has identified 'Housing' as a priority of its 2019-2027 Strategic Plan, specifically to ensure all of its citizens have access to "safe, affordable, attainable and sustainable housing options in the City of Greater Sudbury". As a direct provider of social housing, funder of housing-related programs, facilitator of development and regulator of building safety, the City is witnessing the provincial housing supply crisis first-hand. With this perspective, the City offers the following comments with respect to the Review of A Place to Grow and Provincial Policy Statement.

### **General**

Growth pressures and development issues experienced in southern Ontario and reflected in the policies of A Place to Grow are not the same as in the north. There are fundamental differences in land supply, ratio of urban vs rural/natural areas, pace of development, population density, infrastructure age and capacity in northern Ontario. The City of Greater Sudbury for example, with a population of 166,000, is 3,200 square kilometers in size, with less than 10% of that designated for urban and rural development. The remainder of the municipality includes 330 lakes, rural areas and, primarily, undeveloped wilderness environments. The City of Toronto, by comparison is 630 square kilometers in size.

As a result, a streamlined, province-wide PPS intended to enable municipalities to approve housing faster and increase the supply housing must address the unique context of northern Ontario and Greater Sudbury. This includes, slower growth, ample residential land supply with high servicing costs, large swaths of natural areas located outside of designated growth areas (including Crown Land), and a relatively small population supporting large amounts of linear infrastructure.

In response to the feedback sought in ERO number 019-6177, the City of Greater Sudbury offers the following comments:

**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*** –The City of Greater Sudbury consists of small amounts of designated urban and suburban land, surrounded by a substantial amount of rural, natural, and crown land. Greater Sudbury’s designated settlement area represents less than 5% of the municipality’s total land area yet it is still sufficient to accommodate an additional 40 years of residential growth. The City’s challenge is not land supply but ensuring that sufficient residential density is achieved within the existing settlement area, utilizing existing infrastructure where possible. Allowing for additional residential lands to become available in the rural areas is not necessary and will strain the existing service provision capabilities and infrastructure capacity of the City.

***Attainable Housing Supply and Mix*** – It is unclear how a policy document will “provide greater certainty” that a specific range and mix of housing options and densities will be possible or that enough development, particularly housing, will occur in an urban growth centre. Since northern municipalities are currently not part of A Place to Grow it is unclear how they will be incorporated into a new, streamlined PPS.

***Growth Management*** – The City of Greater Sudbury is not experiencing the same growth-related pressures as many southern Ontario municipalities, making these policies less relevant. The main issue is ensuring sufficient densities in existing built-up areas to lessen the financial burden of infrastructure maintenance and ensuring that infrastructure capacity exists where development is proposed. For northern Ontario, and Greater Sudbury in particular, growth management policies in the PPS should allow municipalities the flexibility to achieve the most growth, using existing infrastructure within their designated settlement boundaries.

***Environment and Natural Resources*** –

- a) Agriculture is important to the local economy and, as such, continued protection of prime agricultural areas from rural residential encroachment is vital. Housing in prime agricultural areas should be directly related to active farming.
- b) As stated previously, Greater Sudbury’s designated urban settlement area covers less than 5% of an otherwise forested 3,200 square kilometer municipality that also includes a small, active agricultural area. The Province should ensure that the natural heritage policies of the PPS recognize the northern Ontario context, particularly within a municipality’s designated settlement areas. In this respect, the Province should consider how Crown lands in the north can be used offset any impacts in this context.
- c) The City of Greater Sudbury has a large resource-based economy, particularly mining and aggregates. The City is supportive of appropriate changes to permit streamlined and simplified access to mineral and aggregate resources where appropriate.

**Community Infrastructure** – The City is supportive of aligning infrastructure capacity with development needs. However, without further details surrounding the ‘flexibility’ that would be afforded for servicing new development, there is concern that ‘flexibility’ would allow for urban development to occur in advance of, or entirely without, municipal water and wastewater, which is not supported.

**Streamlining Planning Framework** – The City is generally supportive of streamlined land use planning processes. However, it is important to understand which studies would no longer be required, why they were originally required, and the impact of no longer requiring them.

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

Greater Sudbury has no shortage of designated and zoned lands to permit an increased supply and diversity of housing types. The City is challenged by other limiting factors noted above, including a Canadian Shield topography which makes designing and servicing new development within the settlement boundary challenging. Policy changes that would aid the City in delivering more housing, including flexibility within the settlement boundary would be supported.

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

The Province has recently introduced legislation to streamline land use planning policy to increase the supply of housing, including *More Homes, More Choice Act*, 2019, *More Homes for Everyone Act*, 2022 and the *More Homes Built Faster Act*, 2022. The City of Greater Sudbury has made use of the new tools available through these Acts, including allowing up to 3 residential units per property and delegating the removal of Holding By-laws to staff. In Greater Sudbury there is currently an ample supply of residential units in draft approved subdivisions and site plans to meet our projected needs for the next 20 years. Consideration needs to be given in a review of the PPS to the different housing issues, pressures and needs that vary across the province. With respect to the mandatory fee rebates introduced in Bill 109, the Province should consider situations that are outside of the municipality’s control, including comments from external agencies and deferral requests from the applicant and allow municipalities the ability to “stop the clock”.

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

As stated above, the current growth management policies in the PPS are effective and many of the development streamlining opportunities afforded through recent legislative changes have been implemented by the City of Greater Sudbury. As also stated, the development pressures, land supply and pace of growth vary considerably across the province. A Place to Grow is well structured to address the specific context of growth in the Greater Golden Horseshoe. As separate documents, these policies and plans

currently allow for growth to be managed at provincial and regional levels with appropriate context. There is a concern that combining these documents will lead to a province wide approach to growth management that has been developed for southern Ontario and the GTA, with policies that are unnecessary and not implementable province wide, particularly in northern Ontario.

### **Conclusion**

The City of Greater Sudbury is ready to do its part in supporting growth and housing in Ontario, but the Province must create policies and development approval processes that recognize the unique circumstances in northern Ontario where the context, issues and growth are much different than southern Ontario. Although the challenges facing housing supply in the North are complex, these can be overcome with support from the Province.

Respectfully submitted,



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