

PPS/A Place to Grow – Comments December 29, 2022

The government of Ontario is proposing to integrate the *PPS* and *A Place to Grow* into a new province-wide planning policy instrument with the underlying intent being to increase the number of homes available.

We've spent decades of time, tens of thousands of dollars on consultants, and stored gigabytes of supporting data to help promote our available land for the betterment of the population. However, in each case, the proverbial straw that broke the camel's back were the restrictions in the PPS.

Our suggestions allow for pragmatic and equitable solutions.

1) Lack of available and affordable housing

In the democracy of supply and demand, the most effective way to increase the number of housing units available is to increase supply which is clearly the path forward. Here are specific modifications to the PPS that could be implemented immediately to accomplish this:

a) Make more land available to increase market supply and construction competition

- i) Section 1.1.2 of the PPS should be modified to permit municipalities to extend the 25-year time restriction currently in place at the sole discretion of the Municipality.

This would not penalize existing approvals and would immediately allow high-demand areas to be considered for settlement area expansion. This increase in supply, by extension, would allow more affordable homes to be purchased by first time buyers and increase housing supply at every price point.

b) Reduce bureaucratic delays and policy restrictions to speed up the development process.

- i) Section 1.2.1 of the PPS does not support *time being of the essence*. We recommend “should” be replaced with “shall” in Section 1.2.1 of the PPS and that “shall coordinate schedules” be added to this paragraph as an additional term. This would allow for much more effective and coordinated planning between lower and upper-tier municipalities.

In our case, both Sarnia (lower-tier) and the County of Lambton (upper-tier) approved of Sarnia's New OP but there is no allowance in the PPS for a “coordinated schedule”. Under the current PPS, upper-tier maps cannot be modified to allow for approved lower-tier OP's until upper-tier comprehensive reviews are done years later.

c) Utilize existing infrastructure efficiently.

- i) PPS Section 1.6.3 states: “Before consideration is given to developing new infrastructure and public service facilities: a) the use of existing infrastructure and public service facilities should be optimized”

This should be modified: “shall be optimized” to allow for the efficient use of existing infrastructure, especially in areas of high demand.

- ii) Add PPS Section 1.6.3 (c) (or alternative Section) Settlement area expansions shall be considered in areas where the expansion would more efficiently utilize existing infrastructure.

Sarnia recently upgraded their existing infrastructure in the Brights Grove area to allow for 50% more residential growth but cannot efficiently utilize this existing infrastructure due to the restrictions in the PPS.

d) Develop high-demand areas.

- i) PPS Section 1.1.3.8 (a) of the PPS should replace “satisfy market demand” with “satisfy market and location demand”

PPS Section 1.1.3.8 (a) is the only policy that mentions “market demand” which, in professional planning terms, means “the quantity of houses demanded at each price”. The critical attribute of “location demand” is completely ignored to the detriment of settlement area expansion.

The PPS forces planners to prioritize growth only in the settlement area without regard for the efficient use of existing infrastructure elsewhere.

- ii) A new PPS policy should be added as: *Section 1.1.3.8 (a)(i) Projected land needs calculations shall include historical growth patterns in low demand areas to allow for settlement area expansion in high demand areas.*

Every realtor knows that the three most important values in real estate are location, location, and location yet the critical metric of “location demand” has never existed in the PPS. The issue of “location demand” was completely overlooked in Sarnia’s OP due to the restrictions in PPS Section 1.1.3.8. Large areas of low-demand in Sarnia have been relatively stagnant for the last 30 years while areas of high-demand areas are full. Projected growth in areas of low-demand are kept historically high preventing settlement area expansion in high-demand areas.

- e) Lack of affordable housing.

- i) A new PPS policy should be added in Section 1.4.3 (a) (i): implementing publicly available and transparent “scorecards” illustrating targeted and realized affordable housing results during each OP review. These scorecards would be the local basis for further refinement in subsequent OPs. “Sustainable financial development” would be a metric in the scorecard.

Affordable housing is championed as a component of community development when it is still only a concept in practice.

The PPS should require municipalities to detail their affordable housing targeted and realized goals during every OP. This would promote accountable, affordable housing direction.

Understanding the PPS “is to be read in its entirety and the relevant policies are to be applied to each situation” would allow our suggestions for additions/modifications in a non-conflicting approach.