

December 23, 2022

To the Public Input Coordinator
MNR – PD – Resources Planning and Development Policy Branch
300 Water Street, 6th Floor, South Tower
Peterborough, ON
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Re: ERO 019-6177: Review of A Place to Grow and Provincial Policy Statement

On behalf of our many municipal clients, we are submitting our comments related to the proposed changes to the *Planning Act* as proposed by Bill 23 (*More Homes Built Faster Act*), as amended by the Standing Committee on Heritage, Infrastructure and Cultural Policy.

Overview Commentary

The Province has introduced Bill 23 with the following objective: “This plan is part of a long-term strategy to increase housing supply and provide attainable housing options for hardworking Ontarians and their families.” The Province’s plan is to address the housing crisis by targeting the creation of 1.5 million homes over the next 10 years. To implement this, Bill 23 introduces a number of changes that seek to increase the supply of housing. As part of Bill 23, the Ministry of Municipal Affairs and Housing (MMAH) is undertaking a housing-focused policy review of A Place to Grow and the Provincial Policy Statement (PPS). More specifically, MMAH is proposing to integrate the PPS and A Place to Grow into a new province-wide planning policy instrument that:

- Leverages the housing-supportive policies of both policy documents;
- Removes or streamlines policies that result in duplication, delays, or burden in the development of housing;
- Ensures key growth management and planning tools are available where needed across the province to increase housing supply and support a range and mix of housing options;
- Continues to protect the environment, cultural heritage and public health and safety; and
- Ensures that growth is supported with the appropriate amount and type of community infrastructure.

Provided below is a summary of key considerations regarding the integration of the above-referenced provincial planning documents, particularly as it relates to long-term growth management and urban land needs.



Review of Potential Integration of Place to Grow and Provincial Policy Statement (PPS)

Since the release of the Growth Plan in 2006 under the *Places to Grow Act, 2005*, Greater Golden Horseshoe (GGH) municipalities have been in a continuous cycle of developing and defending growth management processes and Official Plan updates. Over the past several years all GGH upper-tier and single-tier and many lower tier GGH municipalities have initiated the process of updated their respective Official Plans to bring these documents into conformity with the Growth Plan, 2019. Within the GGH, this process is referred to as Municipal Comprehensive Review (MCR). Many GGH municipalities have completed their draft MCR analysis and draft Official Plan updates for Provincial approval, while several others are approaching completion.

The required technical analysis associated with the growth analysis and urban land needs assessment component of the MCR process is set out in the Provincial Land Needs Assessment (LNA) methodology guidelines, which is specific to GGH municipalities.¹ The MCR process has required tremendous time and effort on behalf of all GGH municipalities, consulting agencies, stakeholder groups and involved residents. The results of these efforts represent a key planning milestone for all GGH municipalities and provide a strong foundation to build on as it related to future growth management implementation, monitoring and benchmarking.

Ontario municipalities located outside of the GGH are also now in process of updating their respective Official Plans in accordance with 2020 Provincial Policy Statement (PPS). Outside of the GGH this process is referred to as a Comprehensive Review (CR). While there are benefits regarding the consolidation of the PPS and Growth Plan into one inform document as it relates to the MCR and CR process, there are a number of issues which should be considered regarding this effort, particularly as it relates to long-term growth management and urban land needs, including:

- **Long-Term Population and Employment Forecasts** – Schedule 3 of the Growth Plan, 2019, establishes minimum long-term population and employment forecasts by upper-tier and single-tier municipalities in GGH to the year 2051. The Ministry of Finance (MOF) also establishes long-term population forecasts for all Ontario Census Divisions (which typically represent upper-tier municipalities including separated municipalities as well as single-tier municipalities). The MOF forecasts are not recognized as official forecasts for planning purposes in Ontario, however, they are updated annually and can be used to inform population forecasts in Official Plans. Under a consolidated Growth Plan and PPS, consideration would need to be

¹ A Place to Grow: Growth Plan for the Greater Golden Horseshoe, Land Needs Assessment Methodology for the Greater Golden Horseshoe. August 2020.



given to the role and source of minimum growth forecasts established by the Province for Ontario municipalities.

- **Provincial Land Needs Assessment Methodology Guidelines** – As previously noted, the LNA methodology for GGH municipalities was updated by the Province in 2020. In accordance with the Growth Plan, 2019, the Provincial LNA methodology provides a step-by-step approach to conducting growth forecasts and urban land need assessments for GGH upper-tier and single-tier municipalities for Community Area (i.e. living areas) and Employment Areas. All other Ontario municipalities rely on the 1995 Provincial Projection Methodology Guidelines (PPMG) for guidance regarding the technical approach to growth forecasts and urban land need assessments. It is noted that the 1995 PPMG suggests that a simplified methodology can be for smaller or low-growth municipalities. It is further noted that the Province of Ontario 1995 Projection Methodology Guidelines are meant to be used as “best practices” and are not mandatory. Under a consolidated Growth Plan and PPS, consideration is required regarding the application of a standardized land needs assessment methodology for Ontario municipalities.
- **Addressing Urban Land Needs by Lower-Tier Municipality and Urban Settlement Area** - An important term used in the PPS in the context urban land needs and housing affordability is the *Regional Market Area (RMA)*. The RMA is defined in the PPS, 2020 and the Growth Plan, 2019 (with modifications) as follows:

“...an area that has a high degree of social and economic interaction. The upper or single-tier municipality, or planning area, will normally serve as the regional market area. However, where a regional market area extends significantly beyond these boundaries, then the regional market area may be based on the larger market area. Where regional market areas are very large and sparsely populated, a smaller area, if defined in an official plan, may be utilized.”

With respect to urban residential land needs assessments, the broad objective of this policy is to ensure the efficient and wise use of all designated urban lands (both occupied and vacant) within the RMA before expanding settlement area boundaries. A key challenge with the application of this policy is that urban residential land supply mismatches are common across southern Ontario municipalities at the urban settlement area level within the defined RMA geography.

If the RMA definition is interpreted too rigidly it can have the impact of constraining residential urban development in urban settlement areas indefinitely where urban land supply shortfalls exist as a result of identified urban land surpluses determined elsewhere within the RMA. Neither the PPS, 2020 or the Growth Plan, 2019 provide direction for addressing residential urban land need supply and demand mismatches



within the RMA. Section 2.2.1.6 of the Growth Plan, 2019 also provides a policy regarding Excess Lands which applies exclusively to Outer Ring GGH municipalities. Under a consolidated Growth Plan and PPS, a review of the RMA and Excess Lands policies would be required to determine an appropriate and standardized approach to addressing localized urban residential land shortfalls and surpluses.

- **Residential Intensification Targets and Minimum Density Requirements**
– Section 2.2.7.2 of The Growth Plan, 2019 provides direction with respect to minimum greenfield density targets for GGH upper-tier and single-tier municipalities ranging between 40 and 50 people and jobs per gross ha. Minimum density requirements are also prescribed in the Growth Plan, 2019 for Strategic Growth Areas (SGAs) such as Urban Growth Centres (UGCs) and Major Transit Station Areas (MTSAs). The PPS, 2020 does not prescribe minimum density targets for Ontario municipalities but does require municipalities to establish density targets for areas adjacent or in proximity to MTSAs and corridors.

Section 2.2.2.1 of the Growth Plan, 2019 requires upper-tier and single-tier GGH municipalities to establish minimum intensification targets within delineated Built-Up Areas (BUA) which were established under the Growth Plan, 2006. The delineated BUA within GGH municipalities has remained unchanged since it was established in 2006. The PPS, 2020 also requires municipalities to establish residential intensification targets, but does not prescribe minimum density targets for Ontario municipalities. Furthermore, the PPS, 2020 does not require municipalities to delineate built area boundaries in Official Plans, however, some Ontario municipalities outside of the GGH have delineated built area boundaries for planning purposes. It is noted that delineation and of built area boundaries may be subject to change or updating for municipalities outside of the GGH, while BUAs with the GGH are to remain fixed as of 2006. Under a consolidated Growth Plan and PPS, a standard approach to minimum density requirements and residential intensification targets would be required for all Ontario municipalities.



We appreciate the opportunity to provide comments related to the proposed changes on behalf of our municipal clients.

Yours very truly,

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