

Memo

To: Ministry of Municipal Affairs and Housing

From: Planning, Development and Building Services, Legal and Finance
Departments, Town of Oakville

Date: December 30, 2022

Subject: ERO number 019-6177 - Housing-focused policy review of A Place to Grow
and the Provincial Policy Statement

Comments

The Town of Oakville is aligned with the province's goal of building 1.5 million homes over the next 10 years. The town also supports the purpose and intent sustaining the province's land use planning framework exemplified in the *Planning Act* and the 2019 Growth Plan, including the:

- protection of ecological systems, including natural areas, features and functions
- conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;
- integrated planning, adequate provision and efficient use of communication, transportation, sewage and water services, waste management systems and public service facilities;
- orderly development, protection and achievement of safe, healthy & complete communities;
- adequate provision of a full range and mix of housing, including affordable housing with the prioritization of intensification in strategic growth areas;
- protection of the financial and economic well-being of the province and its municipalities;
- promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians; and
- integration of climate change considerations into land use planning and growth management

Land use planning for growth and development that supports economic prosperity, protects the environment and helps communities achieve a high quality of life remains pivotal for the Town of Oakville and the Province of Ontario.

Municipal Affairs and Housing is proposing to integrate the Provincial Policy Statement and the Growth Plan into a new province-wide planning policy instrument. The Town of Oakville supports the integration of provincial plans and policies in order to increase clarity, reduce duplication and potential planning conflicts.

The new policy instrument should continue to maintain a vision for Ontario to be a great place to live, work and play in communities based on strong economies. The Greenbelt will be protected along with a clean environment for future generations. This will be supported through the achievement of complete communities with access to integrated public transit and transportation networks, protected employment zones and an increasing range and mix of housing.

QUESTIONS from ERO number 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?*

Residential Land Supply

A balanced approach to growth management focused on compact and complete communities that include residential, employment and mixed use areas is fundamental for a streamlined province-wide land use planning policy instrument.

Clear criteria that can be relied upon by municipal planning authorities for settlement area boundary expansions, provision of rural housing and employment area conversions are critical to be maintained. The focus must remain on long-term planning, a stable land supply and timely provision of infrastructure.

There are sufficient lands presently designated for urban development in the province, new urban lands should not be identified or added at the expense of natural environment areas, agricultural areas or cultural heritage resources.

Attainable Housing Supply and Mix

Housing Mix - Market-based demand should be one consideration for policy directions to provide greater certainty for an appropriate range and mix of housing. Other considerations should include the extent to which land within existing urban areas and defined urban structures including strategic growth areas (SGAs) is being utilized.

Major Transit Station Areas – Planning for mixed use development, including housing, will support growth in appropriate locations. Further direction and clarification around land use compatibility and transition from existing uses to planned uses is necessary.

The province must recognize and clarify how the balance will be maintained between stable, long term employment uses located in existing MTSA areas and new planned mixed uses, including sensitive uses such as housing.

Urban Growth Centres – Urban growth centres and other identified SGAs are an effective growth management tool for municipalities.

New provincial planning policies should clarify that the identification and delineation of new SGAs and similar changes to the municipal urban structure should occur through municipally led official plans and official plan amendments in an established process such as the municipal comprehensive review.

Development applications that support and maintain the municipal urban structure could be prioritized through streamlined planning application processes.

Growth Management

Population and Employment Forecasts – These are important long-range planning tools and should be maintained in a new provincial policy. New policies could further clarify the need to recognize local municipal context in terms of range and mix of housing as well as employment land demand and the relationship to the timely provision of infrastructure.

Intensification – This is an important growth management tool and its application within an urban structure framework of hierarchical SGAs is essential. Policies that clarify the need for minimum density targets within and across a municipal planning framework would also be helpful.

Large and Fast-growing Municipalities – New policies should maintain and improve direction to coordinate growth management within the municipal urban structure to align with major investments in mass public transit and critical urban infrastructure to achieve planned minimum densities.

Environment and Natural Resources

Agriculture – Protection of agricultural lands should be maintained and enhanced within the new in a new provincial planning framework. New housing should be directed towards existing urban areas and rural settlements in conjunction with existing and planned infrastructure.

New housing development should not take the form of scattered rural development with impacts to the agricultural land base and critical farming operations. Sustainability and climate resiliency for this region is directly linked to the protection of agricultural lands.

Natural Heritage – As with the comments above, protection of natural heritage lands should be maintained and enhanced within the new provincial planning framework. New housing development is not appropriate on natural heritage lands.

Natural and Human-made Hazards – A balance between development of new housing and protecting future residents from development in hazardous lands must be strengthened in a new provincial land use planning policy.

The effects of climate change as well as the frequency and severity of extreme weather events are increasing within Ontario’s communities. New development, including housing, should be planned for the long-term and incorporate resiliency and be based on the achievement of safe, healthy & complete communities.

Aggregates – The new provincial land use planning policy should provide for the careful balance between environmental impacts of aggregate extraction and hauling with considerations such as protecting natural heritage and recreation lands in and around sensitive areas like the Niagara Escarpment.

Cultural Heritage – The conservation of cultural heritage resources is critical for the sense of place, character and identity in communities. A new provincial policy must be clear on how housing intensification can be accommodated alongside the conservation of cultural heritage resources.

Community Infrastructure

Infrastructure Supply and Capacity – A new provincial policy should require municipalities to undertake growth management planning to establish where and how the community will grow along with planning for the appropriate and timely infrastructure to support that growth.

School Capacity – A new provincial policy should facilitate development of new school models for urban areas including vertical schools, schools in mixed use areas and the use of shared facilities.

Streamlined Planning Framework

A new provincial planning policy should support consistency, transparency and streamlining in the municipal sector. Tools like delegation and approval authority can shorten timelines in the approval process in order to implement provincial policy sooner and deliver housing faster.

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

The province should continue to deliver land use planning policy that provides for the long-term protection of natural heritage, public open space and cultural heritage resources, maintains the character of established areas through managed change and directs growth to identified nodes and corridors including SGAs supported by transit.

Provincial direction on policies that support development of climate resilient communities are essential, along with requirements and support for meaningful indigenous engagement.

Provincial land use planning policies must provide certainty to guide major infrastructure investment and to maximize cost effectiveness as the basis for making planning decisions.

Policies that provide for a range and mix of housing, including affordable, rental and attainable housing, and that maintain transit supportive densities are critical.

Clear guidance on implementation and interpretation should remain a focus.

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

A continued emphasis on consolidating and reducing conflicting and overlapping provincial plans should be a priority. This would streamline planning approvals and increase the supply of housing.

Limitations on appeals to the Ontario Land Tribunal for municipally-led official plans and official plan amendments will reduce or eliminate litigation and hearings and help deliver housing in a timelier manner.

Clear guidance on implementation and interpretation should remain a focus.

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?

The entire set of policy concepts from the Provincial Policy Statement and the Growth Plan should be carried forward. The municipal official plan must continue to be the most important tool to implement provincial policy in the public interest. It should be clear that these policies represent minimum standards.

Policies that support growth management and intensification in an organized urban structure aligned with existing and planned public transit and diverse transportation choices along with the timely provision of infrastructure and public service facilities should be aligned and strengthened.

Municipal official plans and municipally-led official plan amendments resulting from transparent public processes and municipal council decisions must be sheltered from appeals in order to prevent delays in the implementation and delivery on provincial interests including housing.

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?*

The new policy document should clarify and streamline the standard for land use planning evaluation and municipal planning decisions. Will the standard be “*must be consistent with*” or “*must conform and not conflict with*”?

Regarding municipal comprehensive review (MCR), the province should provide for a streamlined transition from existing MCR work underway or completed.

Current advantages for single and upper-tier municipalities should be streamlined in the new policy document along with a greater deference towards municipally led Official Plans and Official Plan Amendments where complete communities including housing are prioritized.