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December 23, 2022

Provincial Land Use Plans Branch  
13th Flr, 777 Bay St  
Toronto, ON  
M7A 2J3  
Canada

Dear Sir or Madam,

Re: ERO Number 019-6177

The City of London appreciates the opportunity to comment on the proposed changes to The Provincial Policy Statement, 2020 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow). Recognizing that the City of London is not subject to A Place to Grow, the City's response to the five questions posed by the Ministry of Municipal Affairs and Housing is focused on the proposed changes as they relate only to the PPS.

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

The City continues to support policy direction that promotes efficient land use planning and growth management strategies that are intended to achieve cost-effective development patterns, optimized transit investments, and minimize land servicing costs. To that effect, long-range infrastructure planning is required and the City recognizes a need for legislation to be in place to recover costs for growth studies.

The City continues to support policy direction that encourages the planning of municipal sewage and water services in a manner that optimizes the use of existing infrastructure, is financially sustainable, and protects human health and safety and the environment. The City continues to support policy that calls for the planning of stormwater management in such a way that prevents increases in contaminant loads, erosion, and changes in water balance. The City believes that it is important that policy direction continues to support stormwater management best practices including stormwater attenuation, low impact development, and maximizing the function of vegetative and pervious surfaces in order to mitigate risks to human health, safety, property, and the environment, and to prepare for impacts of climate change.

The City continues to support policy direction that encourages the planning of parkland and recreational infrastructure that optimizes efficient use of land by allowing low-impact municipal park amenities to be within hazard lands instead of tablelands, where appropriate. The City believes that it is important to minimize permitting processes for park infrastructure and to continue to support best design practices so that park infrastructure supports healthy communities and climate change initiatives while mitigating risk to health, safety, property, and the environment.

The City continues to support policy direction that compels the conservation of significant cultural heritage resources, including built heritage resources, cultural heritage landscapes, and archaeological resources. However, the City has concerns of provincial policy to create “flexibility to increase housing supply,” as a local lens can be more sensitive to conserving what makes a resource significant (heritage attributes and cultural heritage values) while sensitively supporting context-sensitive housing developments.

The City continues to support policy that encourages a mix of housing types and levels of housing affordability. In order to achieve a housing mix that includes all levels of affordability, it is important that cities are supported in their efforts to build affordable housing not achievable through the private sector. Although streamlining efforts may support this, the City has concerns that a high-level of flexibility may reduce City funds that could otherwise have been dedicated to ensuring housing targets are met.

The City continues to support policy direction that protects prime agricultural lands. The City has concerns regarding proposed policies that will increase flexibility to enable more residential development in rural areas with the potential to expand boundary limits of Urban Growth Areas and Rural Settlement areas, as rural areas do not have the infrastructure or community supports to adequately accommodate large increases in population and also undermines other provincial policies that support inward and upward growth within established settlement areas.

The City has concerns regarding the lack of quality-of-life aspects addressed in the six core elements, as the Provincial Policy Statement emphasizes quality-of-life considerations such as promoting land use compatibility, healthy and active communities, efficient transportation systems, and air quality. These aspects are absent in the core elements proposed by the Ministry of Municipal Affairs and Housing.

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

The diversity of housing types is most limited in the affordable sector which is where government policy and support has the greatest opportunity to increase supply and tailor the options available to the needs of Ontarians.

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

Provincial support for publicly-owned affordable housing is the best mechanism to ensure that not only is the housing needed being built, but that people are able to find affordable housing following the discontinuation of rent control measures.

**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 City has concerns regarding the lack of policy direction encouraging efficient development patterns that optimize the use of land, resources and public investment in infrastructure and public service facilities, which is a key component of the Provincial Policy Statement. Ensuring that land is used efficiently results in higher densities and overall more residential units built. It is also essential to ensuring municipal services are constructed and utilized in a financially sustainable manner.

The City supports proposed growth management policies that extend to regions, which includes the coordination with major provincial investments in roads, highways and transit.

**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 City continues to support policy direction that streamlines planning processes, given sufficient time is maintained for adequate review and public consultation within these processes.

The City supports a coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education's proposal to support the development of an urban schools' framework for rapidly growing areas.

Sincerely,

A handwritten signature in black ink that reads "Heather McNeely". The signature is written in a cursive, flowing style.

Heather McNeely, MCIP RPP  
Director, Planning and Development  
City of London