



LONDON DEVELOPMENT INSTITUTE

December 30, 2022

Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Flr., 777 Bay St.
Toronto, ON
M7A 2J3

ERO: 019-6177

Dear Ministry Staff

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our city for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

LDI wants to thank the Provincial Government for your commitment in supporting housing supply in Ontario. Your efforts will provide housing availability and affordability for all.

Please accept the following comments regarding the review of the Provincial Policy Statement.

Our core comment is that any changes to the PPS should remove any barriers using the following principles:

1. "Highest and Best Use": to allow for more housing options and opportunities
2. "As of Right": underlying approach to planning policy and legislation including municipal zoning
3. "Concept of Flexibility": to be imbedded in planning policy and legislation to provide new housing growth

Residential Housing Supply

- Municipal planning boundaries including Urban Growth Boundaries and Built Area Boundaries must be evaluated and updated more frequently.
- Evaluation of growth projections must also be more frequent and simplified to reduce time and cost of the growth analysis.
- A growth buffer for unanticipated growth should be required.
- Focus should be future servicing requirements to service future population projections as currently serviced land will be absorbed to meet current demand and considered absorbed.
- Rural housing development should allow for more flexibility and innovation in servicing alternatives as well as improved individual municipal decision making in the two-tier County system.
- Employment land and building conversions should be simplified and more permissible based on private sector market driven conditions.



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Attainable Housing Supply and Mix

- Definition of "Attainable Housing" should encompass all types of housing being available to meet market demand and not limiting one housing form over another.
- "Highest and Best Use" and "As of Right Zoning" as key principles in delivering housing mix and supply
- Removing residential type and style limitations to allow for more flexibility and supply throughout a municipality.

Growth Management

- Municipal policies such as Urban Growth Boundaries and Built Area Boundaries should be required to be reviewed more frequently to capture up to date population growth projections.
- Growth projections be simplified, and standard methods be developed and required.
- Growth projections be required to incorporate a growth buffer to protect against unanticipated growth.
- Growth policies reflect the growth needs and patterns for urban communities outside the GTAH

Environment and Natural Resources

- Accepted mitigation tools be recognized earlier in the planning process to make development lands within an urban growth boundary available sooner.
- Provide clear definitions and requirements for man-made hazards and naturally occurring hazards.
- Clear and simplified aggregate policy for developments within an urban growth boundary.
- Clear and simplified archeological study requirements.

Community Infrastructure

- Allow for flexibility and innovation in servicing options in support of new development
- Limitation of school site size need to be introduced to better intensification school site development.
- Shorter timeframes for the release of school site allocations not to be used for new facilities.

Streamlined Planning Framework

- Simplifying and streamlining the planning process requirements.
- Limit on municipal processes that go beyond provincial planning requirements.

We want to thank you for your consideration of our points. The development industry wants to be part of the affordability solution in London. LDI would be happy to provide any further information or clarification of our submission.

Sincerely,

Mike Wallace
Executive Director