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### **OPPI Comments on Review of A Place to Grow and Provincial Policy Statement & Conserving Ontario's Natural Heritage Discussion Paper**

On behalf of the Ontario Professional Planners Institute (OPPI), we are writing to provide our commentary in response to the Ministry of Municipal Affairs and Housing's (MMAH) Review of A Place to Grow and Provincial Policy Statement (ERO 019-6177) and the Ministry of Natural Resources and Forestry's (MNRF) discussion paper entitled Conserving Ontario's Natural Heritage (ERO 019-6161).

OPPI is the recognized voice of Ontario's planning profession. With over 4,600 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, provincial and municipal approval bodies, private developers, community agencies and academic institutions.

#### **MNRF Consultation: Conserving Ontario's Natural Heritage**

MNRF is seeking to develop an ecological offsetting policy in Ontario that would serve to mitigate negative impacts of land use decisions on natural heritage by offsetting them with intentional restoration or creation of new natural heritage features such as wetlands.

OPPI would submit that development proposals in natural heritage areas should be avoided and pursued only as a last resort in situations where isolated natural features exist, and a superior offset can be achieved. The assessment of appropriate offsets should be focused on enhancing nearby ecological features and ideally be located in the same or another proximate watershed. This approach has been successfully pursued by various Conservation Authorities in efforts to avoid disconnected natural heritage features.

## **MMAH Consultation: Review of A Place to Grow and Provincial Policy Statement**

MMAH is proposing to integrate the Provincial Policy Statement (PPS) and a Place to Grow into a new province-wide planning policy instrument. OPPI supports the consolidation of provincial plans and policies into one document to reduce potential confusion and ambiguity and increase clarity. However, the exercise should ensure there are no unintended consequences for municipalities that may now be captured by a single policy document but previously did not fall under the Growth Plan’s policy direction.

Over time, for clarity, the government might wish to consolidate other provincial plans and policies into the document. The Growth Plan for Northern Ontario, Niagara Escarpment Plan, Greenbelt Plan, Lake Simcoe Protection Plan, and the Oak Ridges Moraine Conservation Plan are examples of other plans that could be included for ease of reference.

In the short term, OPPI supports the province’s successful “one window” planning initiative where MMAH Municipal Services Division staff provide one consolidated set of comments from provincial ministries on planning applications where the province is a commenting or approval authority.

The Ministry seeks to undertake the exercise with a lens of accelerating approvals and increasing housing supply. The proposal includes an overview of core elements that may be included in the new consolidated provincial policy document.

OPPI is pleased to provide its feedback on these elements through the five discussion questions in the consultation posting as follows:

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

OPPI’s feedback on the proposed elements within the categories outlined in the document are as follows:

#### **Residential Land Supply**

*Settlement Area Boundary Expansions* – the proposal would include streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries.

OPPI recognizes the importance of maintaining minimum intensification targets and creating compact walkable communities with minimum density targets. The province has recently published new land supply policies and clarified the approach to land budget calculations municipal planners are to follow. MMAH has also indicated its willingness to monitor implementation of municipal land supply calculations to address the Auditor General's findings in their December 2022 report.

Intensification can make an important contribution to any municipal land budget as long as any proposed increase in intensification is supported by realistic land use policies and infrastructure plans. Any new policies on land supply should require a balance of ground-related, missing middle and high-rise housing based on the market needs and characteristics of each community.

*Rural Housing* – the proposal would include policy direction that provides more flexibility to enable more residential development in rural areas, including rural settlement areas.

OPPI does not support scattered rural residential development for fiscal, agricultural compatibility and environmental reasons. The majority of development should be directed to rural and urban settlement areas to achieve servicing efficiency and to reduce climate and other environmental impacts. Increasing housing supply and development in rural areas outside of rural settlement areas may increase pressure on long-term asset management and service delivery, resulting in high infrastructure costs to support these developments.

*Employment Area Conversions* – the proposal would include streamlined and simplified policy direction to allow municipalities to more promptly pursue opportunities to convert lands within employment areas.

OPPI supports the direction, though it is important to maintain policies that require a long-term planning approach to employment. To speed up the Municipal Comprehensive Review (MCR) and conversion request process, the province could introduce time limits for making decisions on conversion requests (or MCRs). However, protections should continue for employment areas that are deemed to be in critical demand, including employment areas adjacent to major goods movement corridors. Ensuring appropriate land use compatibility requirements are retained for air, noise, and odour to test suitability of a conversion and limit the introduction of sensitive uses in employment areas would be important.

## **Attainable Housing Supply and Mix**

*Housing Mix* – the proposal would include policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs.

OPPI supports consideration for market-based demand, with the caveat that it should be responsive to the characteristics of each community including the extent of strategic growth areas and potential for higher density housing within that community. Housing policy should support and require a range of housing, with consideration for affordability, efficient use of existing and planned infrastructure, land conservation, and locating housing where people can meet their needs and support community and commercial activity.

*Major Transit Station Areas* – the proposal would include policy direction to provide greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities.

OPPI supports this policy direction and sees it as having meaningful impact to support additional housing supply in appropriate locations. To ensure land supply, minimum density targets should be applied to all strategic growth areas not just in MTSAs. The policies should also be clear that the minimum targets are not to be treated as caps.

*Urban Growth Centres* – the proposal would include policy direction that seeks to enable municipalities to readily identify centres for urban growth (e.g., existing, or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur.

OPPI supports the concept of urban growth centres as an effective policy tool in the Growth Plan for coordinating and focusing growth. This strategic growth area policy tool should remain in any revised policy framework and be applied to other large fast-growing municipalities. The policies should provide for streamlined planning application processes within the urban growth centre. As well, the requirements for density to be achieved by 2031 should be changed to be achieved by the planning period set out in the revised PPS / Growth Plan.

## **Growth Management**

*Population and Employment Forecasts* – the proposal would include policy direction that enables municipalities to use the most current, reliable information regarding current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment.

OPPI encourages the forecasts to consider market needs of ground-related, missing middle, and high-density housing while balancing the need to achieve intensification and density targets in the strategic growth areas within the municipality. These forecasts should also align with the realistic infrastructure capacity of the municipality.

*Intensification* – the proposal includes policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas.

OPPI supports the existing strategic growth area policies in the Growth Plan. They should remain in the combined document and potentially be strengthened with requirement to establish minimum density targets for all strategic growth areas in any revised policy framework.

*Large and Fast-growing Municipalities* – the proposal includes growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways, and transit.

OPPI is of the view that MMAH should leverage existing policies to support transit-oriented development and support sustainability and resilience. In addition to policy refinements, the province should coordinate the focus of growth in strategic growth areas within all fast-growing municipalities with investment in infrastructure and transit to achieve planned densities in these areas.

## **Environment and Natural Resources**

*Agriculture* – the proposal includes policy direction that provides continued protection of prime agricultural areas and promotes Ontario's Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations.

OPPI is concerned that additional flexibility may erode important agricultural areas without adding significant housing, or focusing housing in appropriate locations. Limited growth in rural areas should be focused in currently designated rural settlement areas, and not in estate lot subdivisions or to enable further scattered rural development. The broader focus of the revised policies as it relates to agriculture should be on enabling housing supply for agricultural labour as opposed to scattered growth in rural areas.

*Natural Heritage* – the proposal includes streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting / compensation (Proposed Updates to the Ontario Wetland Evaluation System).

With respect to these proposed policies and the offsetting proposals set out in MNRF’s “Conserving Ontario’s Natural Heritage” discussion paper (ERO 019-6161), OPPI would submit that development in natural heritage areas should be avoided and pursued only in situations where a superior offset can be identified. OPPI recognizes that this approach has been pursued by various Conservation Authorities in cases where development would create disconnected natural heritage features and corridors.

*Natural and human-made hazards* – the proposal includes streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk.

OPPI encourages an appropriate balance between the need for housing supply and the need to protect future residents from construction on hazardous lands. With increased storm intensities due to climate change, protection of hazardous areas including floodplains remain critically important and mitigates against significant costs for government, insurance companies and individuals.

*Aggregates* – the proposal includes streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed.

OPPI recognizes the need to ensure an adequate supply of aggregates for intensification, infrastructure, and development. To minimize cost and environmental impacts of long-distance haulage, proximity to market is important, but this needs to be carefully balanced against other considerations such as natural heritage and recreation potential in sensitive areas like the Niagara Escarpment.

*Cultural heritage* – the proposal includes policy direction that provides for identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply.

OPPI believes protection of cultural heritage resources are important for the character and sense of place in communities. Housing intensification can be accommodated with conservation of cultural heritage resources, but policies need to be clear in that regard.

### **Community Infrastructure**

*Infrastructure Supply and Capacity* – the proposal includes policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning.

OPPI supports provincial policy that would require municipalities to proactively undertake growth management planning, establishing where and how the community will grow while planning for the appropriate infrastructure to support that growth. However, limitations to municipal debt capacity pose challenges that often impede adequate and timely services. OPPI encourages the Province to adopt Recommendation #5 from OPPI's Top 10 Housing Supply and Affordability Recommendations. The proposal calls for the Province to align its infrastructure funding and financing programs with the Growth Plan to ensure provincial support is targeted towards essential servicing for new housing developments.

*School Capacity* – the proposal includes 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.

OPPI is supportive of new models to accommodate schools in fast growing intensification areas where current models of suburban school sites do not work. These could include facilitating vertical schools, and schools in mixed-use developments and broadly encouraging the use of shared facilities for greater efficiency and range of amenities.

## **Streamlined Planning Framework**

*Outcomes-Focused* – the proposal includes streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes.

OPPI supports a focus on improving consistency and transparency in the municipal comprehensive review and land needs assessment processes while also ensuring the Auditor General’s December 2021 recommendations regarding the importance of diligent provincial monitoring to ensure government objectives are implemented.

Streamlining can be achieved through a variety of tools including various recommendations OPPI has previously submitted to MMAH such as an enhanced delegation framework for technical planning approvals. These include providing heads of planning departments with the default authority to approve draft plans of subdivision, lifting of holding provisions and part lot control, consents to sever within the built-up area, and validation certifications.

*Speed and Flexibility* – the proposal includes policy direction intended to reduce the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier.

OPPI supports efforts to simplify and streamline the MCR process through the changes that we recommended in this letter.

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

OPPI recommends consideration of the following policies:

- Prioritizing the types of housing that already align with existing policy priorities, including transit-oriented development and complete communities. The focus should be on specific policies that achieve a balance of ground-related, missing middle, and high-density housing based on the market demands and characteristics of each community while balancing intensification and density targets.





- Promoting attainable housing for vulnerable populations, supporting affordable housing, and establishing more ambitious goals and funding / incentives to deliver such housing needs.
- Maintaining the supply of rental housing by clarifying and enhancing rental housing retention and replacement requirements.
- Maintaining the requirement for minimum densities for greenfield areas and making them applicable to all communities.
- Facilitating zoning reform that includes requiring as-of-right zoning which aligns with the Official Plan in strategic growth areas across Ontario and allowing for zoning with conditions.
- Encouraging upfront planning tools such as a Community Planning Permit System (CPPS).
- Clarifying growth targets and allocations in accordance with overall provincial housing targets.
- Protecting natural heritage by providing clearer definitions of natural features where development is not permitted.

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

The Province should look beyond A Place to Grow and the Provincial Policy Statement. Over time, there may be opportunities to consolidate various provincial plans and policies into a single provincial policy document to reduce redundancy and areas of ambiguity. Over the medium term, OPPI recommends the government consider exploring a consolidation of the Growth Plan for Northern Ontario, Niagara Escarpment Plan, Greenbelt Plan, Lake Simcoe Protection Plan, and the Oak Ridges Moraine Conservation Plan into a single provincial policy document.

The Province should also provide implementation guidance for any new plans and policies along with ongoing implementation support for the new policy document. This should include guidance on how new policies are to be implemented in a variety of circumstances

and be released at the same time as the introduction of new policies to avoid a period of uncertainty.

**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 strategic growth area intensification policies in A Place to Grow have been effective policy tools for gaining approval for housing density in appropriate locations. These policies should apply to all fast-growing municipalities in Ontario and be enhanced in any revised provincial policy framework.

Enhancements could include:

- Increasing minimum density targets for strategic growth areas to align with projected needs for housing and to recognize that they will have to accommodate substantial proportions of future housing development. These targets should be appropriate to recognize the unique nature of communities across the province.
- Addressing the challenging adjacencies of strategic growth areas and low-density neighbourhoods, where the latter limit the potential to realize the objectives of the former. Provincial policies could establish a more logical transition area, so that intensification can be optimized in strategic growth areas, with complementary gentle intensification in the surrounding area.
- If the number of strategic growth areas are to be increased, decisions should be based on transparent policy rationale and a logical criterion.

Provincial policies should make a stronger and more direct link between policies supporting housing growth, complete communities, reducing GHG emissions and limiting the effects of climate change. Municipal decisions on planning applications proposing housing intensification often do not typically consider the connections between these policy objectives, and instead focus primarily on issues of fit, transition, and traffic impacts.

A Place to Grow is clear that intensification targets represent minimum standards, and that municipalities are encouraged to exceed them. However, in practice municipalities and communities often treat minimum density targets as maximums or dismiss planning

arguments for additional intensification in areas where minimum densities have been or are projected to be met. Provincial policy could provide stronger and clearer direction in this regard.

Section 2.2.8 (Settlement Area Boundary Expansions) of A Place to Grow has valuable policies that should remain in the revised policy document. However, some of the infrastructure study requirements should be simplified. For instance, there should not be the need to determine if infrastructure is financially viable over the lifecycle at this stage. That should be done at the detailed secondary plan level. In addition the requirement for “the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water” is an onerous test that should be addressed later in the planning process such as during secondary planning when greater information is known on the proposed land uses and the watershed conditions.

The minimum percentages of residential development in built up areas provided in A Place to Grow are also important for advancing housing development.

The PPS policy language regarding compact built forms should be strengthened, so that the policy requires rather than promotes those housing types in municipalities. Similarly, the PPS policies in Section 1.4.3 regarding “permitting and facilitating all housing options” should be strengthened to clarify that this is an expectation in all communities.

## **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?**

OPPI recommends the following policy concepts in the two documents be combined and streamlined:

- PPS 1.1.3 and Growth Plan 2.2.1
- PPS 1.1.3.8 and Growth Plan 2.2.8
- PPS 1.3 and Growth Plan 2.2.5
- PPS 1.1.5 and Growth Plan 2.2.9
- PPS 1.6 (servicing policies) and Growth Plan 3.2
- Growth Plan policy 4.2.1 and PPS 2.2



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- Growth Plan 4.2.8 and PPS 2.4 and 2.5
- Growth Plan 4.2.10 and PPS 1.8
- Growth Plan 4.2.2, 4.2.3 and 4.2.4 and PPS 2.1
- Growth Plan 4.2.6 and PPS 2.3
- Growth Plan 4.2.7 and PPS 2.6

Thank you for the opportunity to provide feedback as the Ministry of Municipal Affairs & Housing undertakes a review of A Place to Grow and the Provincial Policy Statement.

If you have any questions or would like to setup a meeting to further discussion our submission, please contact OPPI's Executive Director Susan Wiggins at (647) 326-2328 or by email at [s.wiggins@ontarioplanners.ca](mailto:s.wiggins@ontarioplanners.ca).

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Lowes".

Paul Lowes, M.E.S., MCIP, RPP  
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A handwritten signature in black ink, appearing to read "Susan Wiggins".

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