



**Ontario**  
Home Builders'  
Association

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December 30, 2022

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, ON M7A 2J3

**Proposal Number: ERO 019-6177**

**RE: Review of A Place to Grow and Provincial Policy Statement**

**The Ontario Home Builders' Association (OHBA)**

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, developers, professional renovators, trade contractors and many others within the residential construction sector.

The OHBA is coordinating our public policy response with regards to Bill 23, the More Homes Built Faster Act, 2022 with input from members across Ontario. OHBA is proudly affiliated with the Building Industry and Land Development Association (BILD), the West End Home Builders' Association (WEHBA) and the Greater Ottawa Home Builders' Association (GOHBA). OHBA supports provisions expressed by our affiliated associations that speak to regional land use planning considerations within their area.

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

OHBA is an ardent supporter of the Growth Plan and the PPS to ensure long-range planning to ensure an adequate supply of a diversity of housing typologies and the infrastructure to support housing in complete communities. OHBA generally agree on the proposed core elements to be included within a province-wide land use planning policy instrument. In review of the elements, we believe the Provincial Government should seek to provide separate requirements for large and faster growing municipalities versus those for smaller or slow-growth municipalities. It is important that the primacy of housing as a provincial priority be asserted, rather than a product of whatever is left after all other considerations are addressed.

Large municipalities would be those municipalities with a population over 75,000 people as of the 2021 Census, and fast-growing municipalities would be those with population growth over 4,000 people between the 2016 and 2021 Census. This is particularly the case regarding policies related to growth management, intensification, and minimum housing and employment forecasts. Smaller or low-growth municipalities should not be required to undertake such time-consuming work, as it would impose a significant burden on their resources with no benefit in planning and approving of new development.



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

For Larger/Fast Growing Municipalities, the new policy documents should include the following key land use planning policies into a new modernized policy document designed to increase the supply and diversity of housing in one of the fastest growing and most supply constrained jurisdictions in North America:

- To ensure that all municipalities plan for their share of growth, the province should continue to issue minimum housing and employment growth forecasts for larger municipalities every 10 years. The forecasts should be for a 30-year time horizon and should account for the municipality's long-term ability to accommodate growth. The development of such forecasts should be done in consultation with the municipalities and the development industry to align growth needs and requirements (such as servicing infrastructure). The new policy document should require municipalities to plan to achieve these housing targets at a minimum with provincial oversight.
- Municipalities should identify strategic transit-oriented growth areas where transit-oriented development should be focused. Municipalities shall identify and delineate *Major Transit Station Areas* (MTSAs) within 800m of stations or stops on planned or existing higher-order transit routes. Furthermore *Urban Growth Centres* (UGCs) with supporting intensification policies should continue to be a core planning feature of new provincial planning policy documents. Moreover, the Province should establish guidance material for a typology/hierarchy of MTSAs and UGCs, identifying the minimum heights and densities that could be planned in relation to varying surrounding urban development and the form of transit service. Municipalities must plan for transit supportive density focused on MTSAs and UGCs with minimum height and density permissions, and where no maximum heights or densities shall be permitted except where such densities could not be supported by servicing availability and where heights would conflict with other Provincial and Federal requirements (e.g., airport height limitations).
- Municipalities shall delineate *Built-Up Areas* that generally encourage intensification through the entire area. *Built-Up Areas* should generally include all areas that are built or contain registered plans of subdivision at the time of a comprehensive review. The new policy document should require that official plans contain policies that encourage intensification throughout the entirety of built-up area for all missing middle and denser housing typologies. OHBA notes that currently many municipalities often have policies that encourage intensification throughout the *Built-Up Area* but have conflicting policies in their Official Plans that actively discourage significant residential intensification from occurring in and adjacent to existing neighborhoods. A new Provincial planning policy framework should have stronger policies to facilitate intensification throughout the entire *Built-Up Area*, especially for larger sites within or adjacent to existing neighbourhoods where significant opportunities exist to encourage intensification.
- Municipalities should be required to undertake long-range master planning of infrastructure to at least a 50-year time horizon. This should include long-range land use planning that identifies future growth areas in a long-term urban structure plan to accommodate growth beyond the 30-year planning horizon. Municipalities should establish phasing policies linked to the cost effective and efficient extension of services to guide future settlement expansions.



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- As part of the process for any urban boundary expansions, municipalities should be required to initiate and complete Background Studies and Secondary Planning. This requirement will ensure appropriate and timely land use planning and infrastructure planning to increase the supply and diversity of housing.

**For all municipalities:**

- Municipalities shall identify primary settlement areas where the majority of new growth should be focused. These settlement areas should be identified where there is existing or planned municipal water and wastewater systems and where alternate servicing solutions can be used where no services exist and where they can support the achievement of complete communities. With primary settlement areas, municipalities should identify *Strategic Growth Areas (SGAs)* on lands along major roads and areas served by frequent transit as a focus for accommodating higher-density mixes uses. Municipalities will establish minimum housing and employment targets to achieve a complete range and mix of uses and minimum densities and heights in these areas.
- Municipalities will establish minimum housing and employment targets to achieve a complete range and mix of uses and minimum densities and heights in these SGAs. On an annual basis municipalities shall be required to prepare a report to Council to be submitted to the Minister of Municipal Affairs and Housing highlighting how housing and employment targets are being achieved.
- Municipalities should be required to plan for sufficient land to meet a 30-year planning horizon with sufficient supply of a mix and range of housing by unit type through an updated Province-wide *Land Needs Assessment Methodology*. The province should amend the *Land Needs Assessment Methodology (2020)* to standardize the document as a Province-wide document, differentiating between larger and smaller municipalities.
- Settlement Area Boundary Expansions should be permitted in advance of a comprehensive review as to the size as currently contained in the Growth Plan. As noted above, employment land should be exempt from being part of an MCR process.
- Promote the use of alternative servicing solutions if and when appropriate, to permit development in areas where typical full municipal servicing solutions are not viable.



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

- OHBA would suggest the government generally maintain the structure and requirements of the PPS, with important additional policy directions from selected policies of the Growth Plan. A Housing First policy must be added to the PPS as it is essential in directing how land use decisions are going to be evaluated on a go-forward basis, in particular to streamline the delivery of new housing. Many of the policies of the Growth Plan are heavily reliant on a centralized planning approach that requires extensive work and input from the province, followed by a lengthier implementation process by upper-tier municipalities, then lower-tier municipalities. In general, targets and studies required at a regional or upper-tier municipal level require extensive analysis taking on average 3 to 5 years prior to local municipal implementation. This is particularly true in the policies contained in Section 6 (Simcoe Sub-Area) where a County-wide study is required prior to lower-tier municipal implementation, even though the County does not provide nor coordinate servicing infrastructure related to growth.
- The new policy document should align with the direction in Bill 23, directing more planning to be undertaken by lower- and single-tier municipalities, particularly with regard to development approvals (e.g., Official Plan Amendments, Zoning Bylaw Amendments, draft plans of subdivision and condominium, site plan, minor variances, and consents to sever property).
- The new provincial policy instrument should provide clear policy guidance for municipalities to undertake their own work and analysis. This should include municipality's delineation of *Major Transit Station Areas*, (MTSAs), *Urban Growth Centres* (UGCs), *Built-up Area* and establishing targets for intensification, and determining both land needs and the locations for settlement area boundary expansions. It is still essential that municipalities with the potential to accommodate growth do so and take their proportion of long-term growth forecasts. The province should continue to establish minimum housing and employment targets for these municipalities to ensure that they plan to accommodate that growth.
- The government should consider removing many of the growth management policies that seek to restrict the supply and type of housing. Policies contained in Sections 2.2.7 (Designated Greenfield Areas) and 2.2.8 (Settlement Area Boundary Expansions) go well beyond the PPS in requiring extensive studies and analyses prior to allowing any new housing in growth areas. The policies of these sections have had the effect of adding years to the planning process that have delayed new lands being developed for housing. These policies have contributed to the housing crisis we currently find ourselves in by stretching out the planning process. In particular, the measurement of gross density on the basis of residents and jobs per hectare does not readily translate into clear concepts of community form and is therefore not an outcome-based policy. These policies should be discontinued in the new policy document. • The policies of section 4 of the Growth Plan largely duplicate and add additional requirements to those found in section 2.0 of the PPS. We believe that the policy approach and details in the PPS is sufficient to provide guidance on these matters, and the policies of the Growth Plan should not be maintained in a Provincial-wide document, including as it would have applied to the Greater Golden Horseshoe. The policies of the PPS should be maintained rather than those of Section 4 of the Growth Plan.



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- Finally, the policy vehicle for municipal implementation of settlement area boundary expansion, employment conversion, and implementation of Provincial Plans should be the Comprehensive Review as described in the PPS. References to a “Municipal Comprehensive Review” and the associated definitions in the Growth Plan should be discontinued.



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**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?**

Building off the above, the following policies are helpful in ensuring there is a sufficient supply of housing:

- Directing employment opportunities to infrastructure investment (highway 400 series highways) and the identification and protection of future employment areas in a long-term urban structure plan. Employment conversions should continue to be allowed in advance of the comprehensive review process. Provincially Significant Employment Zones should be removed from the policy set. Within employment MTSAs, the addition of a mix of uses should be permitted without the need for an employment conversion.
- The PPS should establish maximum environmental buffers for environmental features, and permit reduced buffers based on fieldwork undertaken through the development process.
- Complete communities should be planned for a full range of compact public service facilities with sufficient land provided for these uses. The PPS should require that future public service facilities be planned to be compact and provided in urban mixed-use forms. For example, schools (e.g. by setting maximum school site sizes at 2 hectares for elementary schools and four hectares for secondary schools) and transit locations, should be developed without surface parking where possible, and use co-location or use-sharing with other facilities to minimize land requirements.
- Municipalities should identify future growth areas within their Official Plans as part of long-term planning and designate these areas as 'rural areas' within the current planning horizon. Such areas should permit a wide range of rural and urban compatible uses on lands abutting settlement areas, including public service facilities such as parks, cemeteries, infrastructure, and recreational opportunities.



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**What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?**

- Natural Heritage protection should reflect the competing priorities within settlement areas. The policy document should establish an urban lens for natural heritage protection in settlement areas. Policies related to these areas should allow the principal of no net negative impact with regard to natural feature protection. Such policies should facilitate logical settlement patterns by allowing feature removal or relocation with off-setting opportunities for on- and off-site compensation on a 1:1 basis. References to draft Provincial Mapping (for the Greater Golden Horseshoe) should be discontinued.
- In requiring minimum densities, policies should express density requirements in residential densities per net hectare. The gross densities of the Growth Plan that utilize residents and jobs as a numerator should be discontinued. Planning to net residential densities results in greater certainty with regard to outcomes for community form, and better aligns with other requirements of the Planning Act (such as parkland standards).
- Policies related to agricultural protection should be focused on areas outside of long-term growth needs. Municipalities must identify Prime Agricultural Areas and Rural Areas as part of their comprehensive reviews. Clarification should be given that Minimum Distance Separation requirements apply prior to development approvals and should not be used as a basis for modifying settlement areas. References to using draft Provincial Mapping (including the in the Greater Golden Horseshoe) should be discontinued.

We thank the Ministry for the opportunity to comment on these proposals. We also recognize that there is still more work to do and OHBA may provide further comments at a later date. We look forward to continuing engaging with the Ministry in order to ensure these proposals are aligned with the goal of increasing housing attainability.