

Submitted via email to PlanningConsultation@ontario.ca

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Planning Consultation
Ministry of Municipal Affairs & Housing
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OPPI Comments on Housing Needs in Rural and Northern Municipalities (ERO 019-5287)

On behalf of the Ontario Professional Planners Institute (OPPI), I am pleased to provide our comments on the Ministry of Municipal Affairs & Housing's recent posting regarding "*Seeking feedback on housing needs in rural and norther municipalities*" (ERO 019-5287).

About OPPI

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.

RPPs are skilled, professional, and dependable navigators employed to help lead communities towards the Ontario of tomorrow. RPPs are the local experts who bring together differing points of view; they consult and develop recommendations that provide informed choices for decision-makers and elected officials. RPPs act in the public interest as professionals who work to improve the quality and livability of communities in Ontario today and for their sustainability long-term.

Introduction

OPPI supports the government's policy objective to address housing affordability in the Province of Ontario. The issue is shaping up to be a crucial public policy challenge; one that is complex with multiple dimensions that involve all orders of government.

As professional planners, OPPI's focus is on land use planning and its role in the housing policy conversation. To that end, we have worked with the government to advance measures that will lead to more housing being built and built faster in the Province of Ontario. Our initial collaboration has enhanced delegation of technical planning approvals through Bill 13, *Supporting People and Businesses Act, 2021* and then Bill 109, *More Homes for Everyone Act, 2022*.

OPPI has also developed its [Top 10 Housing Supply and Affordability Recommendations](#) that include measures such as:

- Creating a Chief Planner of Ontario (CPO) as an independent, non-partisan Officer of the Legislature to respond to the Auditor General's December, 2021 recommendations and ensure effective implementation of provincial land use plans and policies;

- Promoting new tools that streamline the planning process such as the Community Planning Permit System (CPPS); and
- Leveraging RPPs to streamline decision making by providing sign off on certain planning reports.

Discussion Questions

1. What are the key barriers impacting your municipality in meeting its housing needs that may be unique to northern and rural communities?

Lack of municipal resources – many rural and northern municipalities cannot keep up with existing development-related pressured let alone speed up the development timeline process. The requirements of development are important and have become time consuming. This must be accounted for in the process if we want to maintain responsible development. Rural and northern municipal budgets are limited for planning and development staffing and these positions are often stretched thin with policy updates and processing applications. There is often a lot of turnover due to burn out among staff in rural and northern municipalities.

Delays in review by provincial entities – many rural and northern municipalities without sufficient resources of their own are often caught up in delays waiting for provincial staff to conduct technical review of applications, including but not limited to traffic and environmental reviews. Timely approval of official plans is also often a concern.

Lack of funding for affordable and attainable housing – external funding or partnerships are required to build modest and attainable / affordable housing projects in rural and northern communities. However, there is a lack of interest from development sector partners in building much needed attainable and affordable housing in these communities. In addition, these communities are not able to benefit from tools such as inclusionary zoning that can be used to compel affordability requirements.

Lack of servicing – adequate water and wastewater infrastructure is not available in many communities to support future housing developments. It is cost prohibitive in many rural and northern communities with low densities due to lack of financial incentives to assist with infrastructure development.

Lack of availability of construction workforce and materials – access to a construction workforce in close proximity to many rural and northern municipalities is a challenge. Recent supply chain issues have also made the availability of materials another critical challenge.

2. What kind of flexibility is needed to address housing needs in your municipality?

Employment land conversions – a more efficient process for conversion of surplus employment land to residential (e.g., for affordable housing projects initiated by the municipality in partnership with a developer) is key for rural and northern municipalities. This would require changes in growth plan

policy and flexibility to proceed through an official plan amendment (OPA) process instead of a municipal comprehensive review (MCR).

Rural settlement area boundary expansion – providing a more efficient process for rural settlement area boundary expansions through an OPA instead of an official plan review exercise with flexibility that is not fixed on land area, but by proposal to integrate into complete communities.

Multiple housing units on rural lots – a more efficient process in rural areas and prime agriculture zones to allow multi-generational families on farms be able to construct several housing units related to the farming unit as of right.

Species at risk and provincially significant wetlands – a more efficient process would be helpful to deal with these provincial policies when considering proposals for housing development to occur in many rural and northern municipalities.

3. *What potential tools or policies could the government consider to address housing needs in your municipality while balancing other provincial priorities?*

There are a variety of policies and tool the government can leverage to support housing in rural and northern communities. These include but are not limited to:

- Providing funding for attainable and affordable housing projects;
- Providing funding for water and wastewater infrastructure;
- Providing funding for additional municipal planning resources to process applications;
- Streamlining approval of new Official Plans, Filing of Record of Site Condition, water and sewer infrastructure, etc.
- Financially supporting the implementation of Community Planning Permit Systems;

4. *Do you have other suggestions for ways to improve housing supply and needs in rural and northern municipalities?*

Rural and northern communities are beginning to see rapid change in population which has larger effects on culture, environment and character of spaces that need to be considered.

Time is required to ensure these communities preserve their natural heritage and agricultural lands as a priority. Many rural small towns hold heritage elements which cannot be replaced. It is essential to ensure the character of community is maintained.

Many rural or northern communities have Indigenous communities in proximity. Those communities require time for appropriate collaboration with our Indigenous partners. Community Planning Grants for major projects would be helpful for busy Indigenous communities in retaining expert advice when commenting on major applications. This could be in partnership with the federal government. This is a topic that has not been addressed and is of significant interest to many rural and northern municipalities.

Conclusion

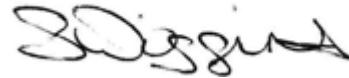
Thank you for the opportunity to provide our initial comments as the government considers measures to address the housing needs in rural and northern municipalities. OPPI looks forward to reviewing specific proposals and providing our ongoing advice to the government as part of future consultations on this key issue.

If you have any questions on our comments, please feel free to contact Susan Wiggins at (647) 326-2328 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



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