

Feedback on Proposed Provincial Planning Statement

Ontario's proposed Provincial Planning Statement (PPS) touches on several aspects of rural housing. The comments and assessment which follows relates to the idea of **rural densification** and how the PPS addresses this or could be improved to better respond to this objective.

Rural densification is not much different than its city counterpart, urban intensification which is covered in the PPS. The term "intensification" is defined in the PPS as:

Intensification: means the development of a property, site or area at a higher density than currently exists through:

- a) redevelopment, including the reuse of brownfield sites;*
- b) the development of vacant and/or underutilized lots within previously developed areas;*
- c) infill development; and*
- d) the expansion or conversion of existing buildings.*

Underpinning this definition is the idea that areas that have already been developed can be developed further by leveraging underutilized spaces within the existing municipal footprint. The logic is simple, leverage existing *infrastructure* and *public service facilities*. This can lead to faster expansion of housing by not linking housing to the need to build significant new infrastructure/facilities (i.e. networks to transport utilities, roads) which takes time and additional public funds. It can also prove more cost effective for municipalities and builders by saving the associated time and costs of these elements in unserved areas. Builders further advance the intensification objective by maximizing the number of housing units (i.e. density) within a particular space available for development. Invariably this is achieved most economically by building multi-unit spaces upward, either in the form of apartments or condominiums.

Just like urban municipalities, intensification as described in the PPS definition is possible in rural municipalities that have an urban footprint and associated infrastructure. However, these municipalities tend to have a limited designated urban/served area and the cost and lead time to add infrastructure (e.g. water and wastewater management capacity) can be long and prohibitive given the limited tax base the rural municipality can draw from. Moreover, housing in rural municipalities is invariably low-rise in nature, both

in keeping with the historic character of these communities and the limited scope of public infrastructure when compared with large urban municipalities.

Yet Ontario is filled with hundreds of rural municipalities that are housing almost two million Ontarians. Like any municipality, these communities need ongoing growth to: thrive, offer economic opportunities, and support public service facilities. This is coloured by the fact that their demographic age profile tends to be older than urban areas which can undermine their growth rate (e.g. higher ratio of retirees). This is then exacerbated where there is limited housing supply for new residents who may want to come to the municipality, as well as housing options for young people who grew up there and want to stay.

At the same time, rural municipalities benefit from the ongoing expansion of high-speed internet which is key infrastructure underpinning their development and is neutral on where expansion occurs in a rural municipality. This recent enhancement to rural life reflects the public policy position that rural living is an important part of the fabric of Ontario and a contributor to the province's development and broader socio-economic needs and goals. With this understanding, and the belief that rural densification can offer an avenue to pursue these objectives, to what extent does the PPS reflect this? This is explained in greater detail below. The brief chart which follows expands on the concept of rural densification and how it can contribute to future housing solutions.

RURAL DENSIFICATION: <i>development on non-agricultural rural lands that seeks to maximize the amount of housing on those lands while relying on existing public service facilities and acceptable forms of water and waste management</i>	
Responds to the need for housing in rural communities (particularly in terms of rental units)	✓
Provides a rural equivalent to urban intensification to respond to housing gaps quickly and efficiently, while countering rural sprawl	✓
Prioritizes housing development of non-agricultural rural lands that optimizes the number of dwellings on these lands.	✓
Prioritizes developments that promote right size higher density new housing, such as small/micro/tiny homes, that require less energy to operate and build, while reducing construction and operating waste	✓
Smaller homes lend themselves to factory-built options which can: 1. lower costs, 2. provide high quality new homes built to CSA/Ontario Building Code standards, 3. speed up deployment of new homes via smaller size and standardized manufacturing processes, while 4. reducing inspection burden on rural municipalities by having preapproved dwellings that do not require municipal oversight through the building process of each home added to their community	✓
Provides a more affordable path to a home through a smaller home footprint that can be delivered in the form of home ownership or rental housing.	✓
Smaller in situ local footprint is environmentally oriented by removing the distance associated with delivering public waste and water services. This in turn lowers costs of developments and speeds up deployment of housing. This approach reflects an eco-system management approach by using and keeping (treated) water on site.	✓
Is a more efficient and effective way of servicing new homes outside existing public services in that municipality. Specifically, communal servicing has its costs borne by the private sector and uses mature technology that can be deployed quickly and scaled up, as necessary.	✓
Relies on existing public service facilities (including roads) and extends their use by growing the rural community, without the need to expand public infrastructure (particularly water and sewage).	✓
Housing can be deployed quickly and efficiently, allowing rural municipalities to respond to economic opportunities and social pressures (e.g. immigrant influx) in real time	✓
Allows for phased development that reduces risks to builders and municipalities	✓
Protects agricultural lands while providing a means for rural communities to thrive and contribute to Ontario's growth	✓
In line with, and builds on, the elements of the draft Provincial Planning Statement.	✓

Review of the Provincial Planning Statement

1. Generate an appropriate housing supply

This overview section of the PPS contains several elements that point to the need for rural municipalities to be flexible and accommodate higher density housing.

PPS Element	Impact
Require municipalities to provide a range and mix of housing options with an expanded definition to include multi-unit types (laneway, garden suites, low and mid-rise apartments) and typologies (multi-generational, student)	<p>This element points to the importance of flexibility in housing types which lends itself to rural municipalities that tend to not utilize high rise structures to respond to housing needs.</p> <p>However, reference to multi-unit examples are city centric where the idea of laneway or garden suites fits an urban (subdivision) layout.</p> <p><i>Rural Suggestion: make reference to small/micro/tiny home communities as an example of “multi-unit types,” highlighting that these homes can be clustered for densification while relying on communal services. This approach aligns with land and services availability associated with rural municipalities.</i></p> <p><i>Further, state the importance of municipalities eliminating minimum size limits on homes and focus instead on meeting the standards set by the Ontario Building Code and Canadian Standards Association.</i></p>
Require all municipalities to implement intensification policies	<p>This is an important statement in that it applies to both rural and urban municipalities. However, the definition of intensification is largely urban oriented.</p> <p><i>Rural Suggestion: add reference to “densification” and define it later in the document whereby it reflects rural realities e.g. “Rural Densification”: development on non-agricultural rural</i></p>

	<i>lands that seeks to maximize the amount of housing on those lands while relying on existing public service facilities and acceptable forms of water and waste management</i>
Provide flexibility for municipalities to allow for more residential development in rural settlements and multi-lot residential development on rural lands, including more servicing flexibility (e.g., leveraging capacity in the private sector servicing	<p>This element aligns well with rural densification and the other suggestions being made on how the PPS could be enhanced to better reflect the rural densification objective. However, the reference to “multi-lot” could be interpreted as a return to large rural estate lots which has limited impact on quickly addressing rural housing needs.</p> <p><i>Rural Suggestion: Change the term “multi-lot” to “multi-unit” to underscore the importance of higher density rural housing.</i></p>
Require municipalities to permit more housing on farms, including residential lot creation subject to criteria, additional residential units and housing for farm workers	<p>This element also aligns well with the rural densification and the other suggestions being made on how the PPS could be enhanced to better reflect the rural densification objective. However, it could be tweaked to better reflect rural reality, as well as the importance of protecting agricultural lands</p> <p><i>Rural Suggestion: Could be reworded to read... Require municipalities to permit more housing on non-agricultural rural lands, including residential lot creation subject to criteria, additional residential units <u>which seek to maximize the amount of housing in the space available</u>, and housing for farm workers</i></p>
Require municipalities to align land use planning policies with housing policies, including addressing homelessness and facilitating development of a full	This element also aligns well with the rural densification and the other suggestions being made on how the PPS could be enhanced to better reflect the rural densification objective

range of housing options and affordability levels to meet local needs	which offers a realistic path to affordability, both in terms of home ownership and rentals.
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2. Make land available for development

PPS Element	Impact
<p>Provide a simplified and flexible approach for municipalities to undertake settlement area boundary expansions. Municipalities would be allowed to create new Settlement Areas and would not be required to demonstrate the need for expansion</p>	<p>This element also aligns well with the rural densification and the other suggestions being made on how the PPS could be enhanced to better reflect the rural densification objective.</p> <p>However as written, it could lead to rural municipalities adding housing that has little regard to intensification or existing public service facilities. While flexibility is important, ensuring rural municipalities do not facilitate random sprawl should remain a clear policy objective (experience shows that the further land is from existing areas, the cheaper land acquisition will be for developers which leads to pressure for sprawl).</p> <p><i>Rural Suggestion: Adjust this PPS element by adding the following sentence at the end of the existing reference...</i></p> <p><i>Municipalities should give priority to efforts that support intensification and densification and that do not require expansion of existing public infrastructure.</i></p>

4. Balance housing with resources

PPS Element	Impact
Require municipalities to designate specialty crop areas and prime agricultural areas,	<p>While this does not speak to the notion of rural densification per se, it does provide an important guideline on what rural municipalities need to prioritize; i.e., the protection of agricultural lands. This could be made clearer by adjusting the current reference to clarify the need to protect these important food production areas.</p> <p><i>Rural Suggestion: Require municipalities to designate and <u>protect</u> specialty crop and agricultural areas,</i></p>

5. Implementation

PPS Element	Impact
Affirm that efficient land-use patterns contribute to increased equitable access to housing, employment, parks and transportation, and encourage municipalities to apply an equity lens on planning matters and engage stakeholders early in the process.	<p>This element also aligns well with rural densification and the other suggestions being made on how the PPS could be adjusted to better reflect the rural densification objective. It does this by referencing equitable access to housing which is a principle that underpins rural densification.</p> <p>Ensuring that equity is given consideration by municipalities, emphasis can be put on housing that focuses on affordability, responding to equity gaps at the lower end of the income continuum (often impacting seniors, young people, single parent families). Putting such a lens forward as a primary consideration may help deter the proliferation of rural lots/estates with large single-family homes which can be a financial attraction for municipalities.</p> <p><i>Rural Suggestion: encouraging municipalities to make equity a priority and policy objective as part of its planning matrix could be made clearer by adjusting the current wording.</i></p> <p><i>... encourage municipalities to apply an equity lens <u>as a priority</u> on planning matters....</i></p>

Proposed PPS (review of detailed document)

Chapter 1 Introduction

<p>Downtowns, main streets and rural areas will be vital and viable.</p>	<p>The vitality and viability of rural areas is particularly dependent on housing, both in terms of allowing residents to stay in their communities, as well as attracting new residents. This is more of a necessity in rural communities that lack large scale economic enterprises that pull people in and foster vitality via interaction with non-residents (e.g. as labour or customers). This underscores the need for a broad range of tools and approaches to housing and where rural densification can be helpful.</p>
<p>Growth and development will be focused within urban and rural settlements that will, in turn, support and protect the long-term viability of rural areas,</p>	<p>This statement is linking the long-term viability of rural (non-urban) areas to growth and development in rural settlements. These settlement areas are often the product on historical (political) amalgamations, footprints that can date back hundreds of years, and may have no link to a detailed calculus related to housing more typical of urban settlement areas. Yet here they are treated the same.</p> <p><i>Rural Suggestion: Adjust the wording to reflect the need for greater flexibility in rural areas to address the housing gap and needs.</i></p> <p><i>“Growth and development will be focused within urban settlements and rural lands that will, in turn, support and protect the long-term viability of rural areas,”</i></p>

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

<p>b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and c) improving social equity and overall quality of life for people of all ages, abilities, and incomes,</p>	<p>Rural densification closely aligns with these objectives as it can offer a rural volume and scale of housing that can lend itself to affordability. This can be particularly helpful to seniors and those who cannot afford to enter the ownership market by orienting rural densification towards smaller homes and rental units that are the most cost effective to build and operate and can therefore be offered at more affordable cost.</p> <p>In urban centres affordability is easiest through multi-unit high-rises. In rural communities, small/micro/tiny homes can be part of the solution by placing multiple units on rural lands in communities that can share communal services.</p>
<p>2.5 Rural Areas in Municipalities</p> <p>1. Healthy, integrated and viable rural areas should be supported by: a) building upon rural character, and leveraging rural amenities and assets; b) promoting regeneration, including the redevelopment of brownfield sites; c) accommodating an appropriate range and mix of housing in rural settlement areas; d) using rural infrastructure and public service facilities efficiently;</p> <p>2. When directing development in rural settlement areas in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels. Growth and development may be directed to</p>	<p>As with other references, while the use of rural settlement area is not in itself problematic, the lack of reference to development on rural non-agricultural lands leaves an implicit gap in tools needed by rural municipalities.</p> <p><i>Rural Suggestion: Augment 2.5(1) by adding the following...(e) prioritizing rural densification, including the development of small/micro/tiny home communities that offer home ownership or rental properties.</i></p>

<p>rural lands in accordance with policy 2.6, including where a municipality does not have a settlement area.</p>	
<p>2.6 Rural Lands in Municipalities</p> <p>1. On rural lands located in municipalities, permitted uses are: a) the management or use of resources; b) resource-based recreational uses (including recreational dwellings not intended as permanent residences); c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate sewage and water services; d) agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices, in accordance with provincial standards; e) home occupations and home industries; f) cemeteries; and g) other rural land uses.</p> <p>2. Development that can be sustained by rural service levels should be promoted.</p> <p>3. Development shall be appropriate to the infrastructure which is planned or available, and avoid the need for the uneconomical expansion of this infrastructure.</p>	<p>This section allows the development of multi-lot residential development on rural lands which is reflective of how development has occurred in the past whereby large rural lots were subdivided into smaller (estate) lots where large homes relying on private services were built. Such an approach has not proven to be an efficient use of land in the past in terms of offering dense housing given the space requirements of private servicing for large single-family homes. With the goal of promoting more efficient and affordable rural land use via densification, an explicit reference to this approach/preference would be appropriate in this section.</p> <p><i>Rural Suggestion: a new subparagraph along the following lines...(h) housing that promotes rural densification, including the development of small/micro/tiny home communities that offer home ownership or rental properties.</i></p>

Chapter 3: Infrastructure and Facilities

<p>3.6 Sewage, Water and Stormwater</p> <p>Planning for sewage and water services shall:</p>	<p>The reference to both existing and non-existing communal sewage services in paragraph 3.6(a) is an important element in rural densification as this is the tool needed to service multi-</p>
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a) accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and **existing private communal sewage services and private communal water services;**

c) promote water and energy conservation and efficiency;

3. Where municipal sewage services and municipal water services are not available, planned or feasible, **private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development** to support protection of the environment and minimize potential risks to human health and safety.

4. Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.

3.7 Waste Management 1. Waste management systems need to be planned for and provided that are of an appropriate size, type, and location to accommodate present and future requirements, and facilitate integrated waste management.

unit rural housing that works to limit the rural footprint of housing in this setting.

Rural densification is also consistent with water and energy conservation and efficiency noted in paragraph 3.6(c) by limiting the volume and distance of water used. Stated otherwise, a community of small/micro/tiny homes is serviced directly where those homes are located, rather than traversing great distances to provide such a community with municipal water and sewage.

Subsection 3.6(3) explicitly makes it clear that communal water and sewage is the preferred form of non-municipal servicing. Again, this lends itself to rural densification where such systems provide the greatest return on investment when serving multi-unit rural communities. The reference to “lot development” here is somewhat ambiguous. Rural estate lots, if these are to be part of a future housing mix, do not lend themselves to communal servicing given the lack of any connection between the various lot owners and the complexity of trying to achieve this, whereas this is not the case for multi-unit development that achieve rural densification.

Subsection 3.6(4) further clouds the case for communal vs private rural servicing as it would be easy for developers to claim communal services are not (financially and logistically) feasible where a rural subdivision is created that spreads homes across a wide area.

3.7 is also unclear when applied to rural waste management services. Specifically, both private and communal services would be oriented to the needs of the development being put in place at the time a development is initially launched. This is different from municipal serving where the planning and space horizon is much broader. What rural densification can accomplish is to ensure that a multi-unit build-out has taken into consideration future phases in terms of space allotted for the purposes of servicing. To illustrate, a small/micro/tiny home community could be built in phases with each phase having its own communal services. It does not grow or overbuild those communal services, but adds them incrementally as housing is added incrementally.

Rural Suggestion: adjust the reference in section 3 so that multi-unit developments that rely on communal servicing are the preferred form of development/servicing in rural areas. This moves away from the current wording which implies that large estate lots and homes are equally acceptable, notwithstanding that this form of housing offers minimal solutions to closing the housing gap and does not prioritize environmentally oriented housing solutions that rural densification supports. This adjustment in wording can be tracked into section 3.6(4) and 3.7