



Ontario
Home Builders'
Association

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RE: Approval of a Municipality's Official Plan – City of Peterborough (ERO # 019-4969)

The Ontario Home Builders' Association (OHBA) appreciates the opportunity to provide comments regarding the *Environmental Registry (ERO posting # 019-4969)*. We understand that the purpose of this posting is to seek comments regarding the proposed new City of Peterborough Official Plan as adopted by the City Council on November 29th, 2021, prior to the consideration of the proposed Official Plan by the *Minister of Municipal Affairs and Housing (MMAH)* for decision.

The OHBA understands that the intent of the proposed new Official Plan is to address the manner in which the City will manage growth over the planning period extending to 2051. It is important to recognize that the majority of growth be directed to the urban area through a combination of intensification and greenfield development. OHBA feels strongly that such an approach must support, facilitate, and recognize the provision of a variety of market-based residential unit types in order to deal with the housing supply crisis the province is facing.

Most recently, OHBA engaged the Smart Prosperity Institute (SPI) to project housing needs for the province on a go forward basis. Dr. Mike Moffatt, Senior Director at the SPI, concluded in his report that there has been a shortfall in housing supply in the province for a period of time and that moving forward through to 2031 there will be a need for at least one million new homes required to satisfy demand. This need will no doubt be challenging to meet. As such, the urban centres such as the City of Peterborough, where considerable investments have been made to provide the necessary infrastructure to accommodate growth, must take the lead in providing its appropriate share and choice of a wide variety of new housing units to accommodate the significant demand expected.

The OHBA maintains that it is important for municipalities, like the City of Peterborough in the review of its official plan, to conform to provincial policies included in the *Provincial Policy Statement (PPS) 2020* and the *Land Needs Assessment Methodology* contained in the *Growth Plan (2020)* which focuses on a market-based projection methodology required to be undertaken as approved by the province. Accordingly, OHBA urges the MMAH to ensure that the following key elements are reflected in the proposed new Official Plan for the City of Peterborough prior to decision.

- Ensure that the projected growth and the need for a wide variety of housing types projected is not underestimated.
- Ensure that the projections are market-based in terms of the types of residential units needed to accommodate family needs as this is of paramount importance.
- Ensure that housing supply, affordability, and attainability are appropriately reflected in the proposed Official Plan to encourage the new housing supply required.



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- Ensure that the proposed new Official Plan accommodates the projections presented in the SPI report prepared by Dr. Moffatt in dealing with future housing needs.
- Ensure that any changes regarding the future growth of the City initiated and subsequently approved by Council do not jeopardize the intent and integrity of the proposed new Official Plan relative to provincial policy.
- Ensure that the proposed new Official Plan reflects and meets the province's efforts and initiatives to reduce 'red tape' in order to deliver appropriate approvals in a timely manner to facilitate developments which lead to increased housing supply in order to implement growth forecasts.

The OHBA strongly recommends that the *Minister of MMAH* addresses the matters raised herein prior to the approval of the proposed new Official Plan for the City of Peterborough. The Official Plan must offer credible solutions to the City's population and housing needs based on sound and realistic assumptions which must reflect the demand currently being experienced in terms of unit type and location. The OHBA strongly encourages the *Minister of MMAH* to ensure that these requirements are met satisfactorily prior to the approval of the City's Official Plan.

The *MMAH* has the opportunity at this time to set the tone and requirements for new Official Plans or *Municipal Comprehensive Reviews* prior to approval which will provide the direction, consistency, and expectation levels necessary to guide municipalities in dealing with the housing crisis in the province. It is a collective responsibility that must be coordinated and well executed. We feel that the *MMAH* is in a position to address the fundamental concerns expressed by the Peterborough and the Kawarthas Home Builders' Association (PKHBA) regarding the proposed new Official Plan adopted by City Council on November 29th, 2021 and advanced by the City of Peterborough for approval.

Although the proposed new Official Plan has taken some steps to articulate some strategic directions dealing with growth management and the provision of housing choices through increasing levels of intensification within built areas, the PKHBA has raised concerns requiring attention by the *MMAH* in part regarding the appropriate amount of land to be included with the urban area to accommodate the future housing supply required in the City. The OHBA strongly recommends that the above matters be addressed and resolved by the *MMAH* immediately and prior to the approval of the new City of Peterborough Official Plan.

The OHBA believes that if demand for housing outstrips supply and our members ability to build the housing required, the core of the affordability problem will be compromised and become worse. Municipalities such as the City of Peterborough, need to take bold steps through their new Official Plans to dramatically increase the housing supply of all types. Otherwise, our collective efforts will not make any meaningful progress towards addressing the affordability crisis Ontarians are facing. OHBA feels that any proposed new Official Plan such as the one submitted by the City of Peterborough needs to be scrutinized from the perspectives presented above.

The OHBA feels that it can play a key role in assisting to bring new Official Plans to fruition which are in alignment with the goals, objectives, and requirements of the province. We value further discussion with *MMAH* staff in this regard and would look forward to such an opportunity. Thank you for seeking comments and input on this especially important matter through this *ERO posting*.