



April 29, 2022  
Ministry of Municipal Affairs and Housing  
Via: [planningconsultation@ontario.ca](mailto:planningconsultation@ontario.ca)

**Re: Conservation Ontario's Comments on "Seeking Feedback on Housing needs in Rural and Northern Municipalities" (ERO #019-5287)**

To whom it may concern:

Thank you for the opportunity to provide comments on "Seeking Feedback on Housing Needs in Rural and Northern Municipalities". Conservation Ontario is the network of Ontario's 36 conservation authorities (CAs). These comments are not intended to limit consideration of comments submitted individually by CAs through this consultation.

Conservation Ontario recognizes the importance of supporting a range of housing options, as well as increasing the overall supply of housing in rural and northern municipalities. Having appropriate land use planning safeguards in place is essential for the overall health of Ontario and Ontarians in these areas. This includes having access to safe drinking water, directing development outside of hazard areas and having access to high quality greenspace, including conservation areas. An integrated watershed management approach can protect public health and safety while facilitating quicker development approvals and more housing supply in Ontario. Rural and northern municipalities face specific barriers as it relates to attracting and retaining talent as well as drawing from a smaller tax base to undertake the necessary studies to ensure that development is directed towards the most appropriate places. Provincial supports, including funding and personnel are required to ensure that land use planning safeguards are applied equally across the province.

Conservation Ontario offers the following responses below to the discussion questions provided through this consultation. It is understood that any specific policy proposals to address the unique housing needs of rural and northern municipalities would be consulted on prior to the government making any additional changes.

### **Discussion Questions**

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

Generally, there are various factors which may create barriers to providing a range of housing in rural and northern areas. Depending on the local context, these may include: limited infrastructure in place to support new housing development (water / wastewater), large minimum lot sizes for individual homes, limited development opportunity in smaller rural communities (small settlement areas), and a limited number of severances permitted on large acreage properties.

Further, consistent with the Provincial Policy Statement, 2020, development must be directed outside of natural hazard areas to safeguard public health and impacts from flooding, erosion, and other hazardous sites. Where a Conservation Authority exists in these rural and northern areas, natural hazard mapping and hazard identification is undertaken, which can assist to appropriately direct development outside of hazard areas. However, it is recognized that mapping in areas not undergoing significant development may be outdated (e.g., require additional detailed studies) or, where no CA exists, mapping may not be readily available. To ensure development in rural and northern areas can occur in a timely manner, the Province is encouraged to continue the work of the Provincial Floodplain Mapping Technical Team led by NDMNRF. Implementation of a provincial framework for floodplain and other hazard mapping would provide clarity on areas where future development and intensification could occur and where it should not occur due to lack of safe access or the presence of flooding hazards. In addition, the Province is encouraged to assist northern and rural communities with providing matching funding for federal grants for floodplain mapping.

**Question 2: What kind of flexibility is needed to address housing needs in your municipality?**

Provincial support and leadership through updating of technical guidance for natural hazard mapping can increase certainty of where development can be permitted. Having hazard areas clearly delineated saves landowners and housing developers time; can result in more robust / comprehensive studies that may be required to support housing development; and result in safer, more affordable developments.

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

Conservation Ontario is supportive of the listed examples for opportunities to support rural and northern municipalities' housing needs, including promoting affordable and appropriate worker housing; lot creation in rural and agricultural areas; additional residential units and rental housing; options for vulnerable populations; and flexibility to facilitate municipal infrastructure provided that the appropriate safeguards are in place. It is important that these opportunities uphold other provincial priorities such as supporting and protecting prime agricultural areas, natural heritage and water resources and systems and protecting public health and safety (i.e., natural and human made hazards and sources of drinking water). In addition to the examples provided, Conservation Ontario offers the following potential tools or policies for consideration to address housing needs in these areas:

- Explore opportunities to “pre-zone” areas for increased housing supply based on provincial, municipal and conservation authority regulation mapping to better highlight the amount of land available which is suitable for housing development and to facilitate faster approvals. Conservation authorities could help to identify appropriate development locations outside of natural hazard areas, including flooding and erosion hazards and which conform to the significant threat policies and designated Great Lakes policies found within source protection plans made under the *Clean Water Act*. Explore re-defining limits of settlement areas in rural and northern municipalities in that context;
- Consider providing flexibility in Official Plans / Zoning By-Laws to allow for additional severances on large rural properties (and allowing secondary dwellings);
- Promote pre-consultation opportunities with all planning authorities (municipalities, CAs, the Province, etc.) to discuss development proposals and identify potential barriers or constraints early in the process. The Province could provide additional supports (e.g., guidelines) to the planning approval authorities to engage in comprehensive pre-consultation with applicants and approval agencies to contribute to faster approval times for missing middle housing;
- Update and harmonize the provincial Natural Hazard Technical Guides to assist conservation authorities and other planning authorities in identifying and delineating hazard features; and,

- Consider enhanced funding to municipalities and CAs to complete comprehensive watershed/subwatershed plans which identify and address key natural hazard and heritage features and systems. Studies should address impacts on the watershed features and systems related to development and servicing, including wastewater and stormwater management. To support this tool, the Province is encouraged to update the 1993 provincial Watershed Planning Guidelines and finalize the recent draft Subwatershed Planning Guide (2022) based on Environmental Registry of Ontario feedback (ERO# 019-4978).

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

It is recommended that the Province, municipalities, and CAs (where they exist in rural and northern areas) work in a coordinated manner to proactively identify suitable areas for increased housing supply in these areas. Through their regulatory requirement to ensure decisions under the *Planning Act* are consistent with the natural hazards policies in the policy statements issued under section 3 of the *Planning Act*, CAs work with their municipal partners and local planning boards, as well as rural and northern landowners to delineate natural features and hazard limits. The delineation of these features and limits, based on surveys and technical studies, ensures the protection of public health and safety while proactively identifying opportunities and potential constraints for development. Planning authorities and regulators are encouraged to work in a coordinated manner to ensure these opportunities and potential constraints are identified early in the development process to limit potential barriers later on. Tools and policies such as comprehensive watershed / subwatershed plans, robust pre-consultation with landowners and developers, as well as updated floodplain and natural hazard mapping will ensure potential constraints can be identified and addressed early in the process, ultimately facilitating faster approvals for housing.

Once again, thank you for the opportunity to provide comments on the “Seeking Feedback on Housing Needs in Rural and Northern Municipalities” (ERO#019-5287). Conservation Ontario looks forward to being engaged by the Province as they move forward with their housing supply action plans. Should you have any questions about this response, please contact me at extension 226.

Sincerely,



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Policy and Planning Specialist

c.c. all CA GMs/CAOs

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