

**DATE:** November 8, 2021

**TO:** Durk Vanderwerff, Director of Planning, Middlesex County  
Marc Bancroft, Director of Planning and Development Services, Thames Centre

**FROM:** Concerned Residents of Thames Centre

**RE: MIDDLESEX COUNTY & THAMES CENTRE OFFICIAL PLAN REVIEWS**

As residents of Thames Centre we wish to see our community guided by planning policies and regulations that: maintain a “small town” people oriented environment; provide affordable living for a range of income levels, age groups and lifestyles; provide and promote an economic base to support the local services; ensure all new developments enhance the level of service and infrastructure provided by the Municipality, County, school boards, utility providers and other public agencies; and maintains and enhances the local eco-systems.

With the recent launch of both the County’s and Thames Centre’s Official Plan (O.P.) reviews, we want to provide the following initial comments on the review process and policy areas to be reviewed. We have provided relevant Provincial Policy Statement directives for context and outlined the implementing actions required to ensure the O.P.s are effective in guiding and regulating future growth.

1. **Municipal Official Plans:** The PPS states (Part I), “Municipal official plans are the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning. Official plans shall identify provincial interests and **set out appropriate land use designations and policies.**”

**Requirement:** As Middlesex County (MC) and Thames Centre (TC) experience **increased development pressures** as a result of the growth and increasing costs of living in London and other larger urban areas, it is necessary to have **more detailed comprehensive** planning policies and regulations to effectively control and shape development that is not just a spillover from larger urban areas but is **appropriate for within our community.**

2. **Minimum Standards:** The PPS states (Part III), “The policies of the Provincial Policy Statement represent **minimum standards.** Within the framework of the provincial policy-led planning system, planning authorities and decision-makers may go beyond these minimum standards to address matters of importance to a specific community, unless doing so would conflict with any policy of the Provincial Policy Statement.” In the same way, the MC O.P. sets the framework and standards for the entire County, while the TC O.P. provides further detailed policies, requirements, and methods to implement land use strategies and policies.

**Requirement:** The O.P. reviews provide an opportunity to now look at what policies and regulations need to be examined in greater detail, leading to the **inclusion of additional criteria and controls beyond the minimum standards previously prescribed.** (Examples of some policy areas that should provide greater detail are outlined below.)

- 3. Housing Options:** The PPS states (Part IV), “Planning authorities are **encouraged** to permit and facilitate a range of housing options, including new development as well as residential intensification, to respond to current and future needs.” As discussed further below, as our population increases, along with greater diversity of ages and incomes, a range of housing options will be required.

**Requirement:** The challenge is to include O.P. policies to ensure that it is **appropriate for our community’s fabric and lifestyle.**

- 4. Healthy, Liveable and Safe:** The PPS states (Part V 1.1.1), “Healthy, liveable and safe communities are sustained by..... ensuring that necessary *infrastructure* and *public service facilities* are or will be available to meet current and projected needs.” ; (Part 1.1.3.7 b), “Planning authorities should establish and implement phasing policies to ensure..... the orderly progression of development within *designated growth areas* and the timely provision of the *infrastructure* and *public service facilities* required to meet current and projected needs.”; and (Part V 1.1.4.3), “When directing development in rural settlement areas in accordance with policy 1.1.3, planning authorities shall give consideration to **rural characteristics, the scale of development** and the provision of appropriate service levels.”

This is required not only to facilitate new development but also to protect and provide necessary services for the existing community going forward.

**Requirement:** For new development this requires detailed **phasing policies** based on a comprehensive review of all infrastructure and services provided by **all public agencies** for the community, not just those required for the specific development. The present O.P.s allow for phasing of developments but do not specify the requirements or criteria for phasing, which should be detailed to allow for considerations such as capacity of local schools, recreational facilities, emergency services, etc. The phasing policies should therefore not only be for individual development proposals but also for the rate of development within the County and each local Municipality as a whole, thereby not allowing one or two large multi-year developments to get approved and control the servicing capacities or the housing market.

5. **Land Use Patterns:** The PPS states (Part V 1.1.3.2), “Land use patterns within *settlement areas* shall be based on densities and a mix of land uses which.... minimize negative impacts to air quality and climate change, and promote energy efficiency.”; and (Part V 1.8.1.f), “Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the *impacts of a changing climate* through land use and development patterns which ..... promote design and orientation which maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation and *green infrastructure*”.

**Requirement:** The O.P.s need to **include policies and design guidelines** for public facilities and new developments to reduce energy consumption, promote connectivity and walkability, and maximises opportunities for passive energy conservation.

6. **Housing Affordability:** The PPS states (Part V 6) “**Affordable:** means

- a) in the case of ownership housing, the least expensive of:

housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for *low and moderate income households*; or

housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the *regional market area*;

- b) in the case of rental housing, the least expensive of:

a unit for which the rent does not exceed 30 percent of gross annual household income for *low and moderate income households*; or

a unit for which the rent is at or below the average market rent of a unit in the *regional market area*.”

The present O. P.s speak to the need for affordable housing but do not define “affordable”, nor specify how MC or TC can ensure it occurs. It only provides a range of ways that the requirements placed on new developments can be modified to increase densities and assist in reducing the cost of land and servicing, but this only allows the developer/builder to reduce their costs, without having to reduce the customer’s cost to buy or rent.

**Requirement:** More detailed policies and means for implementation and control are needed to ensure a range of housing affordability.

7. **Public Notification:** The Planning Act specifies the **minimum** requirements for Public Notice and Meetings for all planning documents. The present O. P.s adopt these bare **minimums** without regard to the impact of specific proposals to a larger area.

**Requirement:** Include enhanced criteria and methods to be used for varying types of planning applications in order that residents, business owners and landowners can be made aware of proposals that may impact them beyond the minimum 120 metres.

8. **Thames Centre O.P. Review:**

- a. The present Review program only provides for **only one** public meeting and open house **after all** the research and the draft updating Official Plan Amendment is **already prepared**.

**Requirement:** To properly inform the residents, business owners and landowners and provide them an opportunity to respond beyond a formal Council presentation meeting, a public meeting should be held once the **Background Research is completed** and documents are available for review for at least **2 weeks**, and again once the draft **Official Plan Amendment** is available for review for at least **2 weeks**. This also allows municipal staff to consider all the comments received prior to advancing to the next stage and allows the residents, business owners and landowners to provide Council with more informed comments at the planned Council presentations.

- b. During Mr. Bancroft's presentation to Council on October 4<sup>th</sup>, he specifically noted that one of the "Key Areas To Review" was "High density (i.e. apartments 4 storeys or more) no current policy direction to allow this form of density".

**Requirement:** Higher density issues, even for 3 storey heights, such as setbacks, sun shadowing, wind deflection, landscape buffering, etc. **need serious consideration**. These are very important policy requirements and standards that will **shape the future and livability** for the residents, the adjacent neighbours and the municipality, and we look forward to reviewing the research and proposed policy details.