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July 13, 2023

Ministry of Municipal Affairs and Housing  
Office of the Minister  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Submitted Online  
<https://ero.ontario.ca/notice/019-6813>

Attention: Minister Clark

**Re: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.**

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The Ministry of Municipal Affairs and Housing (MMAH) is currently engaged in consultation on proposed policies related to an integrated province-wide land use planning policy document called the Provincial Planning Statement. The Provincial Planning Statement takes policies from A Place to Grow and the Provincial Policy Statement to support the achievement of housing objectives.

In 2022, the government initiated a review on approaches for leveraging the housing supportive policies of both documents, removing barriers and continuing to protect the environment through a streamlined province-wide land use planning policy framework. The Province is now seeking input on a proposed Provincial Planning Statement, that would replace the existing Provincial Policy Statement and A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

Based on what the government has heard, the Province has combined the elements of A Place to Grow and the PPS into a new land use policy document that the Province is proposing for public feedback. Through this proposed new Provincial Planning Statement, the government is proposing policies grouped under five pillars:

- Generate an appropriate housing supply
- Make land available for development
- Provide infrastructure to support development
- Balance housing with resources
- Implementation

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The government is also proposing an approach to implementation of the new document, if approved. These include the proposed approach to the following:

- Effective date and transition
- Timing for official plan updates
- Various matters specific to the Greater Golden Horseshoe

The government of Ontario has requested feedback on the proposed policy concepts and proposed wording in the land use policy document. They have requested that when reviewing the document, the following questions be considered. Staff have provided responses for submission to each of the questions below:

1. What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?

Staff are of the opinion that with the aim of creating more housing, planning policy should aim to reduce confusion and complexity. In this regard, the interconnectivity between the Greenbelt Plan and Provincial Planning Statement needs to provide clear separation. The Greenbelt Plan should remain intact to support the Greenbelt, while providing policy consistency.

Staff are also supportive of the policy direction to encourage municipalities to work more closely with school boards and childcare service providers to help deliver more complete communities. Greater integration with healthcare and policing would also better support the notion of complete communities.

2. What are your thoughts on the proposed policy direction for large and fast growing municipalities and other municipalities?

With regards to farmland in fast growing municipalities, staff do not agree with the policy direction to require municipalities to permit more housing on farms, including residential lot creation subject to criteria, unless this housing is in the form of additional residential units, garden suites, or housing for farm workers.

3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?

Staff believe there needs to be more attention paid to the affordability of housing. Staff do not believe the issue of affordability will be dealt with in any meaningful way through the increase of housing supply alone. Removal of the targets and the definitions of affordable and low and moderate income households for ownership and rental housing will make it even harder to generate affordable housing. Staff request that the Province allow the targets and definitions to remain. The same can be applied to the delivery of attainable housing.

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4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, and natural and cultural heritage resources?

### **Agriculture**

As an overarching theme related to farm land, staff maintain that it is critical to the integrity of our food supply that we maintain the integrity of our agricultural lands, especially prime agricultural lands. This is especially important in light of the food supply lessons learned through our Covid pandemic, in which all supply chains were greatly impacted and constrained.

Therefore lot creation and the fragmentation of agricultural lands is not supported within prime agricultural lands. Rural settlement areas should remain the areas in which to focus growth, however reviewing hamlet policies may offer a more appropriate opportunity for rural growth. This approach to growth in the rural area is one which better strengthens existing rural communities in a controlled manner and reduces impacts to agricultural lands.

Furthermore, the following key changes will negatively impact agricultural land:

- multi-lot development permissions on rural lands outside of rural settlement areas (hamlets);
- the removal of requirement for intensification targets and the softening of direction related to urban intensification and redevelopment;
- allowing the establishment of new settlement areas;
- a less stringent process for settlement area boundary expansions; and
- the removal of the alternative locations test for settlement area boundary expansions, mineral aggregate operations and non-agricultural uses.

Staff are supportive of the change to articulate the need for an Agricultural Impact Assessment (AIA) when contemplating the establishment of a non-agricultural use in the prime agricultural area.

Staff continue to support minor policy changes related to ARU's in prime agricultural areas, which closely align with current ARU policies in the County Official Plan and support opportunities for more rural housing. These types of units avoid the pressure of future severance (i.e. shared facilities, close proximity to current dwellings, shared driveways). If severances are permitted for these types of units, this will create pressure to make ARU's bigger and further away from the primary dwelling, promoting farm fragmentation and impacts to agricultural areas.

### **Mineral Aggregates**

Permissive lot creation policies in rural areas raise concerns about the protection of mineral aggregate resources and the impacts on existing and new mineral aggregate operations. On a province wide bases, this will result in the introduction of thousands of new sensitive residential land use, which will impact access to mineral aggregate resources over the long term.

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Staff support the submission requirement of an AIA when considering new or expanded mineral aggregate operations in the prime agricultural area, but seek further clarification and strengthening of policies as they relate to the restoration of mineral aggregate operations, including their timely rehabilitation and the cessation of their operations through an identified timeline.

### **Natural Heritage**

On June 16th, 2023, the Province published an updated version of the Provincial Planning Statement, 2023 (the “PPS 2023”) to the Environmental Registry of Ontario which included natural heritage policies and related definitions. Generally speaking, the natural heritage policies of the PPS 2023 reflect those found in the PPS 2020, with no notable changes made to the natural heritage policies of the PPS 2020. However, the policies have been transposed to Section 4.1 of the PPS 2023, and include several modifications to the definitions associated with the natural heritage policies. Staff have no concerns with these modifications.

5. What are your thoughts on the proposed policies regarding planning for employment?

Staff agree with the direction of having “employment areas” refined to uses such as heavy industry, manufacturing and large scale warehousing and not uses that can locate in mixed use areas. We are supportive of the Provincial direction to allow for a diverse mix of land uses on lands for other employment outside of “employment areas” subject to clear direction related to the transition of uses.

6. Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?

The Province and the development industry also have important roles to play in reducing barriers to bringing housing to market. Much of the provincial focus has been on creating supply through reduction in planning timelines. Staff encourage the province to examine ways to ensure that approvals translate to supply through construction. This may be achieved through sunset clauses for development approvals.

The Town would also request more time to understand the implications of policy change, and for more consideration be provided to the delays resulting from applicants within the planning process.

Sincerely,



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