

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

June 15, 2023

**RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument (ERO 019-6813)  
8569 5<sup>th</sup> Line and 8512 6<sup>th</sup> Line, Township of Essa**

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Weston Consulting is the planner for Angus Manor Park Developments Inc., the owner of the lands located at 8569 5<sup>th</sup> Line and 8512 6<sup>th</sup> Line in the Township of Essa (herein referred to as the “subject lands”). The subject lands are located adjacent to the east side of the Angus Settlement Area Boundary. The purpose of this letter is to provide a formal submission of comments as it pertains to the newly proposed policy directions for Settlement Area Boundary Expansions (SABE) as outlined in the proposed Provincial Planning Statement (PPS) (ERO 019-6813).

The Ministry of Municipal Affairs and Housing (MMAH) is consulting on proposed policies for an integrated province-wide land use policy document, known as the PPS issued under the *Planning Act*. Policy changes under the proposed PPS include modifications to the SABE policies. The proposed changes to the SABE policies are intended to provide a simplified and flexible approach for municipalities to undertake SABE requests. Specifically, municipalities would be allowed to create new Settlement Areas outside of a Municipal Comprehensive Review (MCR) process, municipalities would no longer be required to demonstrate the need for an expansion and the requirements associated with justifying an expansion would be scaled back. We are in support of these overall changes as it will assist in increasing the supply of land that is suitable for development such as the subject lands.

Policy 2.3.4 of the proposed PPS states that:

*In identifying a new settlement area or allowing a new boundary expansion to happen, planning authorities should consider the following:*

- a) *that there is sufficient capacity in existing or planned infrastructure and public service facilities;*
- b) *the applicable lands do not comprise specialty crop areas;*
- c) *the new or expanded settlement area complies with the minimum distance separation formulae;*
- d) *impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and*
- e) *the new or expanded settlement area provides for the phased progression of urban development.*

The subject lands are located directly adjacent to the Angus Settlement Area Boundary. Angus is identified as a Category 2 – Settlement Area and is expected to accommodate the majority of additional future growth in the Township of Essa. Weston Consulting, on behalf of the landowner, submitted a letter in February of 2023, to provide comments on the County of Simcoe’s Official Plan Amendment No. 7 (“OPA 7”), which has not yet been approved. Policy 3.2.26 of OPA 7 indicates that for Essa, there is a Designated Greenfield Area (DGA) land

need of 134.8 gross hectares for community uses and this is expected to be provided through a settlement area expansion. Presently, there are limited opportunities in Angus to expand the settlement boundary. The lands to the north of the boundary are heavily constrained environmentally and entirely regulated by the Nottawasaga Valley Conservation Authority (NVCA), while the lands to the west are constrained by the positioning of the CFB Borden base. The lands to the east and south, including the subject lands, are less constrained by natural heritage features compared to the lands to the north. An expansion of the Angus Settlement Area to include the subject lands is a logical expansion of the settlement area in proximity to an existing residential subdivision and municipal infrastructure. The subject lands meet the criteria to be considered in Policy 2.3.4.

Based on the current context of limited expansion opportunities in Angus, an expansion to include the subject lands would provide for lands readily available for urban development. The subject lands are not a specialty crop area and impacts on agricultural lands or operations in the surrounding area are not expected. The subject lands, as noted above, are adjacent to a large residential subdivision on the west side of 5<sup>th</sup> Line and there are other single detached dwellings located along the east side of 5<sup>th</sup> Line to the north of the subject lands. The subject lands are suitable for residential development.

In our opinion, as it pertains to the subject lands and the overall objective of the proposed SABE policies, we support the direction the Province of Ontario is moving towards to simplify and minimize the review time required for requests such as these. The proposed changes in the proposed PPS would allow for settlement area boundary expansions to be considered in a more efficient manner and assist in facilitating new development by the local planning authorities, through the Township of Essa in this case. The proposed PPS allows for increased flexibility and a local planning focus to help ensure more support is given to appropriate sites that may be overlooked during an MCR process.

We thank you for the opportunity to provide these comments. Should you have any questions, please contact the undersigned.

Yours truly,  
**Weston Consulting**  
Per:



Jenna Thibault, BSc, MPL, MCIP, RPP  
Associate