



THE CORPORATION OF THE TOWN OF MIDLAND

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Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Re: Provincial Planning Statement 2023
Environmental Registry of Ontario posting #019-6813

The Town of Midland welcomes the opportunity to provide comments to the Province of Ontario, with regards to the proposed Provincial Planning Statement 2023 (PPS 2023).

The Town of Midland supports the Province's initiative to consolidate provincial planning policies into one centralized document. This would reduce redundancy and areas of ambiguity within the documents that professional planners have encountered through the interpretation and implementation of the various planning documents.

The revocation of the Growth Plan along with the removal of planning approval authority from upper-tier municipalities will shift the responsibility of establishing growth forecasts to local municipalities. As a result, local municipalities like Midland would be required to complete additional growth management work, prepare methodology for land needs assessment, identify greenfield density targets and priority areas for growth through an updated growth management strategy to guide where and how the municipality will manage growth. Ultimately, this work will be needed to inform subsequent updates to the Town's Official Plan.

The Town of Midland requests that the Province provide financial tools and mechanisms to fund such studies relating to growth management. The additional costs of these studies will be absorbed by municipalities, specifically through taxation as Development Charges can no longer be utilized for studies (Growth Management Studies, Intensification Studies etc.) related to growth and development.

Growth for the Town of Midland is currently allocated and determined by the County of Simcoe. With the imminent removal of the County of Simcoe's planning responsibilities in winter 2024, this is an expected change that the responsibility of growth forecasting would fall to the Town. The consistent guidance for municipalities provided by the Growth Plan to determine if there was enough land to accommodate forecasted growth and will no longer be applicable under the proposed PPS 2023. With this now falling under the responsibility of the municipality, there could be conflicts with surrounding municipalities and challenges with development interests.

Clarification is requested from the Province that Midland remains a Primary Settlement Area and that any rural/agricultural lands within municipal boundary would not be subject to Sections 2.5, 2.6 or 4.3 of the proposed PPS 2023.

As part of the ERO consultation process, the Province requested that municipalities consider the following questions when reviewing the proposed PPS 2023. Town Planning staff have reviewed the questions put forth by the Province and have provided comment to each one accordingly.

Province Question	Town Comment
<p>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?</p>	<p>The Town agrees with the decision to bring forward strategic growth areas from the Growth Plan, which include urban growth areas and major transit station areas. Planning Staff request confirmation that Midland remains a Primary Settlement Area and that any rural/agricultural lands within municipal boundary would not be subject to Sections 2.5, 2.6 or 4.3 of the proposed PPS 2023. The Town welcomes the opportunity to carry out the applicable studies relating to growth management, however further financial support will be required from the Province to assist in the funding of such studies.</p>
<p>2. What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?</p>	<p>Staff agree with the direction the Province is taking with fast-growing municipalities although Midland has not been identified as one of them. The new policies will require intensification in strategic growth areas and major transit station areas with minimum density targets. Having defined delineation areas within a certain radius within major transit stations will allow for development within walking distance of it and will promote the use of other modes of transportation other than personal vehicles.</p>

<p>3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?</p>	<p>Requiring municipalities to provide a range and mix of housing options and to implement intensification policies is a step in the right direction. Instead of the development of solely single-detached dwellings, having townhouses, apartments, and semi-detached housing constructed will provide housing for a variety of people of different income levels and for people with different living preferences. Additional consideration to expanding the type of housing stock to also include laneway, garden suites, low and mid-rise apartments will also contribute to providing valuable housing options which will further benefit the residents of Midland.</p> <p>The Town recognizes that housing policy cannot be approached in a vacuum and that it must be considered in the greater context of community building policies. Recent changes through Bill 23 are anticipated to have unintended consequences on the creation of complete communities; therefore, housing policies must be considered in the greater context of planning for all residents throughout the various ages and stages of life. Some of these considerations around community amenities, desirable urban spaces, public transit access and options, parks and recreational space, cultural heritage, arts and cultural events, programming, and the efficient delivery of services are key elements that also attract people to live in these homes.</p>
<p>4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?</p>	<p>Proposed policies prioritize residential housing over other important elements, such as natural heritage protection and preservation of agricultural lands. More residential development in rural settlements and multi-lot residential development on rural lands will contribute to urban sprawl on agricultural and rural lands taking away valuable farmland and natural resources.</p>
<p>5. What are your thoughts on the proposed policies regarding planning for employment?</p>	<p>Staff agree with the proposed changes to employment areas. Municipalities will have greater control over the removal and addition of employment area lands to suit the local need and context. Residential, commercial, and institutional</p>

	uses being permitted “on lands for employment outside of employment areas” will support the achievement of complete communities. There should be restrictions and policies in place to ensure that compatibility between uses do not impact the surrounding land 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.)?	High building costs are a barrier to accelerating construction and development. Housing is often approved, but the applicant/developer does not begin building as costs are too high or provide the required financial obligations as part of development agreements as the cost of borrowing money is higher. These types of delays ultimately results in sites not being shovel ready to get residential or economic benefitting developments to move forward.

The Town of Midland would like to thank the Province of Ontario for the opportunity to submit comments and we look forward to being further consulted on any subsequent changes to planning legislation that may be proposed.

Yours truly,

THE CORPORATION OF THE TOWN OF MIDLAND



Steve Farquharson, MCIP, RPP.

Acting Director of Planning, Building and By-law