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MGP File: 21-3021

Provincial Land Use Plans Branch  
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**RE: ERO 019-6813**  
**Comments on behalf of the East Gwillimbury Whitebelt Landowners Group**

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for The East Gwillimbury Whitebelt Landowners Group (“EGWLG”), which represents the participating owners of the New DGA Community Area and New DGA Employment Lands (the “Whitebelt Lands”) in the Town of East Gwillimbury. We are writing this letter on behalf of EGWLG to provide comments on ERO #019-6813, “*Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.*”

The EGWLG generally agrees with the policy direction of the new Provincial Planning Statement and the rescinding of A Growth Plan for the Greater Golden Horseshoe. The duplication of policy from the former PPS and Growth Plan led to excessive delay and study requirements of municipalities and developers in the Greater Golden Horseshoe. While some of the policies of the Growth Plan were helpful in promoting transit-supportive densities in strategic areas, many of the policies of this plan unnecessarily restricted the supply of housing and land available for development that was required to meet its growth targets.

The EGWLG has reviewed the proposed PPS and generally believes the structure of requiring large/fast-growing municipalities to be subject to growth management-related policies is appropriate. The differentiation of a policy set for these municipalities is effective in providing one Planning Statement that can be applied province-wide without placing unnecessary or onerous requirements on smaller or slower-growing municipalities.

**Generate an Appropriate Housing Supply**

The new PPS will be effective in generating new housing supply and appropriate housing opportunities in urban, rural, and agricultural areas. The proposal to differentiate between large and fast-growing municipalities and other municipalities is appropriate. The differentiation of policy is effective in providing one planning statement that can be applied province-wide without placing unnecessary or onerous requirements on smaller or slower-growing municipalities. We encourage the province to consider whether the proposed Schedule 1 appropriately includes all large and fast-growing municipalities to ensure the policy goals of the province are being met.

The Town of East Gwillimbury was the fastest-growing municipality in Canada between 2016 and 2021, according to the 2021 Census. In light of this, the Town of East Gwillimbury should be recognized as a large and fast-growing municipality under the new PPS. To this end, *Schedule 1: List of Large and Fast Municipalities* under the new PPS should be amended to include the Town of East Gwillimbury.

To ensure that large and fast-growing municipalities appropriately plan for their share of growth, we strongly encourage the province to continue to prepare forecasted minimum population and housing targets for these municipalities and require that these municipalities demonstrate in their official plans how these targets will be met within the timeframes of the PPS.

The PPS should provide clarity with respect to the delivery of affordable and attainable housing. Although recent changes to the *Development Charges Act* and *Planning Act* have provided additional guidance as to what constitutes affordable and attainable housing and where and how inclusionary zoning may be implemented, municipalities continue to impose their own form of “affordable housing” requirements which are not reflective of or conflict with provincial requirements. In addition, the PPS should clarify that additional residential units are encouraged in all single, semi-detached and townhomes (similar to the permissions under the Planning Act) and that these units can provide a supply of purpose-built affordable rental housing.

### **Make Land Available for New Housing and Employment Opportunities**

EGWLG strongly supports the broadening of opportunities to make areas available for new housing and employment opportunities; particularly, the new tools and options provided to municipalities to accommodate growth.

We strongly support the change for municipalities to plan to a minimum 25-year horizon; given that most new communities will take 25 years to be substantially built, this time horizon is appropriate as a planning horizon. We note, however that along with the planning for this horizon, municipalities must demonstrate how necessary infrastructure is to accommodate and foster this planned growth, including updated master plans and development charge by-laws.

We strongly support the requirement to maintain a 15-year residential land supply and maintain land with servicing capacity for a 3-year supply of residential units. We believe this policy would be more effective if it clarified that the supply of land and units is to be maintained for a market-based supply of units and be specific to unit type. It is as equally important to forecast for and provide the right composition of housing (by housing type), as well as an overall quantity of housing.

We support the definition of employment areas in the PPS (which reflects the definition contained in Bill 97), and the focus on protecting these areas for a concentration of more intensive industrial and manufacturing type uses, while allowing a broader range of mixed-use development on lands for employment outside of employment areas. The province should prepare an update to the D-series guidelines to update the separation requirements for sensitive uses in keeping with the updated definition from the PPS.

### **Provide Infrastructure to Support New Housing and Employment Opportunities**

The policies of the PPS should provide direction to utility providers to integrate their planning with the growth planning of municipalities, and to account for these plans in their future service planning. Moreover, utilities should be strongly encouraged to ensure that sufficient service is available in accordance with planning to support planned growth and the delivery of housing. Where required, the Province should consider legislative and policy changes to ensure that both utilities and regulators provide sufficient services for both existing and future housing to achieve municipal growth plans.

Floodplain mapping and associated modelling in urban areas should be prepared to account for proposed growth, including stormwater management facilities and flood mitigation work in these areas. It is not appropriate to assume a no-mitigation approach to floodplain modelling in an urbanizing area. This approach should be incorporated into the policies of the new PPS and in related guidance material from the Province.

Policies supporting the location of trails and other passive recreation activities within hydro and gas corridors should be added to the PPS. Moreover, when trails and/or recreational opportunities can be provided in these corridors, such areas should be eligible for parkland contribution under the Planning Act.

We strongly support the policy direction to require school boards to integrate planning for schools and growth – the policies should specifically speak to the minimization of school site sizes when co-located with parks and should strongly encourage the provision of schools in mixed-use formats, including within multi-storey residential buildings.

### **Balance Housing with Resources**

The proposed environmental protection policies should be provided in the context of a Housing First policy goal and objective and should be added to the PPS for development within settlement area boundaries. An urban lens should be provided for environmental protection in settlement areas, generally directing that preservation of features should have the objective of maintaining green infrastructure in urban areas to preserve natural functions and the protection of provincially significant features. Such policies would support the provision of housing through the efficient use of land and is to ensure housing in settlement areas takes priority over other competing policy objectives.

We believe it is important to implement modifications to the natural heritage policies to enable our industry to create healthier communities more efficiently and effectively. We will continue to work with our municipal partners to create communities that enable citizens to interact with nature in respectful and sustainable ways. To achieve these ambitious and positive outcomes, we require a degree of smart flexibility in the natural heritage policies and their implementation.

Smart flexibility will best be achieved through the two following distinct, but related changes:

- 1) Shift from the no negative impact test to a no net negative impact test for natural heritage features and associated functions; and
- 2) Formally adopt an ecological offsetting approach to allow for the selective removal of generally smaller and degraded natural heritage areas with limited functions. The

removed features would be replaced, achieving a net ecological gain (i.e., nature positive outcomes).

The current test under the PPS related to natural heritage features and functions (excluding fish habitat) is the no negative impact test. That test specifies, that a "... negative impact is degradation that threatens the health and integrity of the natural features or ecological functions". Health and integrity are not defined terms, in the PPS.

Requirements to achieve no negative impact on any aspect of natural heritage features or functions have proven to be challenging and impractical. It is likely that any development or site alteration activity will have some, often minor or immeasurable impact on one or more aspects of natural heritage features or functions.

The environmental policies could acknowledge that should municipalities choose to preserve other environmental features, such features should be treated as social elements that offer passive recreational opportunities to residents and that they would need to form part of the parkland dedication requirements under the Planning Act.

We thank you for the opportunity to provide comments on the Proposed PPS. We ask that you please consider our comments and amend the PPS accordingly.

If you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**

Principal, Planner, Land Economist, Project Manager

cc: East Gwillimbury Whitebelt Landowners Group