

May 12th, 2024

Landlab Response to the Proposed 2024 Provincial Planning Statement Draft

April 12, 2024 Environmental Registry of Ontario Posting # 019-8462

Dear Minister Calandra,

On behalf of Landlab Inc., I would like to congratulate you and your Ministry on releasing the second draft of the *Provincial Planning Statement*, which represents an important step towards a revitalized land use planning system that will encourage the construction of new homes.

Landlab supports your government's goal of building 1.5 million new homes by 2031 and recognizes that reducing red tape in order to secure faster and more predictable planning approvals is critical to achieving these goals. The proposed reduction of barriers to build new homes will facilitate all new developments that efficiently use land, deliver homes quickly, respect planning principles, and align with the homebuilding goals of your government.

For 25 years, Landlab has designed and built beautiful places that add value to the lives of those who live, work, and play in them. We have added economic and environmental value to the cities in which our projects are located and, through world-class design, we have promoted strong social connections to the neighbourhoods that surround them. Our communities feature a mix of housing options to welcome residents across a wide spectrum of household incomes. We listen carefully to the existing needs of each town we build in and we address these needs in our plans from the outset. This not only adds value to the community as a whole but, by extension, contributes socially, economically, and environmentally to the province.

For over three years, Landlab has worked to advance our Lakeport Beach project in the Township of Alnwick/Haldimand. We strongly believe that the consolidation of the *Growth Plan* and *Provincial Policy Statement* into a single, streamlined document, as proposed by your government, is the correct approach and will help provide a policy context that will facilitate the achievement of Landlab's vision for the Lakeport Beach project, which has the following characteristics:

- The proposed construction of up to 800 new homes
- The project is shovel-ready upon approval and could bring 800 new homes to the market within approximately five to seven years



- The creation of approximately \$3.2-\$3.4 million in new annual revenue to Alnwick/Haldimand Township and Northumberland County
- The collection of approximately \$10.0 million in development charges by Alnwick/Haldimand Township and Northumberland County
- 100% of capital cost of water and wastewater treatment infrastructure will be paid by Landlab with ongoing operations and maintenance 100% funded by users of the systems
- A broad mix of housing types at a wide range of prices – single family homes, townhomes, apartments, bungalows for those with limited mobility, and seniors' units
- Enhanced affordability with a commitment to offer 10% of homes at 10% less than market value
- Over 50% of the land will be maintained as greenspace, including 1.3kms of shoreline preserved for public enjoyment
- 2,080 person-years of employment over the construction period
- \$97 million in construction wages over the build-out of the project
- Up to 243 new permanent jobs
- \$34.0-\$37.5 million per year in new retail spending from new homeowners that will mainly go to existing local businesses

Importantly, the draft Provincial Policy Statement acknowledges the unique relationship which Indigenous communities have with the land and its resources. Landlab will continue to work with First Nations communities and their consultants in Alnwick/Haldimand to address their concerns, and particularly those which relate to their Section 35 Aboriginal or treaty rights.

Landlab's projects and the benefits that they bring to the municipalities in which they are built typically gain broad support from local residents and businesses. At our Lakeport Beach Project in Alnwick/Haldimand, however, we are seeing first hand how a small group of vocal residents can have a disproportionate influence over local councils despite broader opinion polls that show widespread support. This political noise often results in local politicians refusing projects that are beneficial to the community and makes it impossible for the provincial government to achieve its housing goals. We believe that the new *Provincial Planning Statement* will help to address some of these barriers to building more homes.



Landlab's Response to the PPS Draft

Landlab appreciates your Ministry's efforts to expedite home construction across all of Ontario and to recognize that there is a real need for housing in smaller rural towns, not just larger, transit-oriented communities. Landlab has been building communities for more than twenty years, and over those years we have watched as the number of planning regulations and requirements have grown and grown, delaying approvals and adding significant costs to the end user—the families that need homes.

Landlab's experience with the Lakeport Beach Project illustrates the challenges your Ministry faces. There is little recognition at the municipal level of the benefits of creating denser yet sustainable, high-quality communities—yet there remains political support for much lower, sprawling densities, resulting in inefficient development patterns and fewer, much more expensive, homes. This reduces the chances of Ontario meeting its housing goals over the next decade, places an unnecessary financial burden on existing and future taxpayers, consumes more land than necessary, and is not environmentally sustainable.

As an experienced developer, our detailed response to the 2024 draft *Provincial Planning Statement*, which is attached to this covering letter, outlines a number of options which would enable the timely construction of new homes and communities. A summary of our comments include:

- Landlab's support for provisions which help transform Ontario's planning regime into an outcomes-focused planning system that encourages and enables the construction of homes faster.
- Landlab's support for the proposed changes to the settlement area boundary expansion (SABE) process, including the establishment of new settlement areas, to help enable home growth where it makes sense, and where it can be accommodated via supportive infrastructure.
- Landlab's support for those provisions which will enable a broad range of housing types, especially in rural areas, which we think also addresses the shortfall in housing for family-oriented, missing middle, housing.
- Landlab's encouragement of the Province to further implement changes which help to promote dense and well-planned communities in rural areas, by streamlining the process to amend local zoning bylaws to allow for townhomes, which may not be common in these areas.
- Landlab's support for provisions which promote the smart use of limited land resources while promoting complete communities anchored by recreational assets like parks and waterfront.

- Landlab's support for deleting all policies and provisions with respect to the Growth Plan when the new *Provincial Planning Statement* receives Royal Assent, so that all future land use planning decisions must be consistent with the *Provincial Planning Statement*, at the time the decision is made.

Landlab has reviewed the proposed policies in depth, and welcomes the opportunity to provide feedback on how Ontario's land use and planning framework can be improved. It wholeheartedly supports the Province's objective of building 1.5 million homes in the next decade, and knows that Lakeport Beach can, and should, be a part of the solution. A focus on planning outcomes rather than processes, and providing flexibility to explore creative solutions, are vital to achieve the Government's homebuilding vision.

Landlab respectfully submits the following feedback on the 2024 draft of the *Provincial Planning Statement* and would appreciate any opportunity to provide additional feedback which would help your government meet its homebuilding goals.

Sincerely,



Sean McAdam
President
Landlab Inc.

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About Landlab

Landlab is a boutique land development firm headquartered in Ottawa. It is made up of a small, close-knit team that takes on ambitious projects and is dedicated to the creation of meaningful communities.

Landlab projects offer an attractive alternative to traditional suburban planning and are proof positive that investments in thoughtful urban design and high-quality architecture are rewarded by healthier, more vibrant communities. We know the benefits of innovation, harness the advantages of good design, and minimize the risks associated with developing land.



**All photos from Landlab's Hendrick Farm project*

Our Philosophy

Design is at the heart of what makes a place great. The most beautiful cities, villages and communities around the world have a number of time-tested design elements in common. Each of these elements contributes to an environment that puts the needs of people first and, in doing so, creates a setting that helps produce a richer social fabric for their residents and visitors alike. Rome, London, Quebec City, Old Montreal, and the oldest places in North America are attractive places to live and visit because they were designed and built to human scale. They are designed around how people move, rest, interact, and enjoy being in a place.

Landlab's Adaptive Developments adjust current zoning codes in an effort to build places where people and their environment come first. We adapt our development plans to the piece of land, instead of imposing off-the-shelf zoning requirements. By doing this we create places where people are naturally drawn to live, work and play. Landlab communities are truly sustainable, provide a rich social fabric, and enhance the lives of its residents.



Beautiful design allows for a broad mix of housing types in various price ranges. The preservation of natural amenities protects the environment. Visitors are drawn to vibrant, beautiful communities and residents continually reinvest in their community. Property values start higher and remain stronger than communities built to typical standards. Good design means a healthy community and a healthy bottom line for those investing in it. The following are some of the urban planning components that we incorporate into our communities to make them some of the best new communities on earth.



**All photos from Landlab's Hendrick Farm project*

Adaptive Development Principles



HUMAN SCALE ARCHITECTURE

Human-scale architecture is the design of physical elements in the built environment that promote a positive user experience—it's architecture that is optimized for human enjoyment and perspective.



WALKABLE STREETSCAPES

A walkable street uses physical design and landscaping to improve safety by combatting speeding and other unsafe driver behaviours. These streetscapes are also specifically designed with the pedestrian experience in mind—they aim to make the pedestrian experience more interesting, to encourage recreational walking over vehicle use.



POCKET NEIGHBOURHOODS

Pocket neighbourhoods feature homes that share and/or face onto a communal, semi-private green space or courtyard—they are micro-neighbourhoods within the broader community. The shared space at the centre of the pocket neighbourhood has clearly defined boundaries, generally using short garden-fences to separate the private and public spheres.



URBAN PARKS

Urban parks can be the feature green space in a pocket neighbourhood, or larger central commons-style green spaces. They are green spaces that are available to residents and the public alike, and should include open spaces, seating areas, and trees. Urban parks should be interspersed throughout the community where possible—they don't need to be large, they just need to be present.



COMPREHENSIVE PEDESTRIAN NETWORKS

This involves a blended use of sidewalks, alleyways, and footpaths that provide a comprehensive way for pedestrians to easily access all areas of the community. All key amenities should be connected through this pedestrian network.



PRESERVATION OF IMPORTANT NATURAL AMENITIES

Important natural amenities include onsite ecological features such as streams or creeks, riverbeds, trees of significance, or green spaces of historical significance.

Lakeport Beach

Landlab is currently seeking approvals for a new project in the Township of Alnwick/Haldimand in Northumberland County, Ontario. The Lakeport Beach project follows their urban planning principles of Adaptive Development and will be similar in look and feel to Landlab's [Hendrick Farm](#) project.

We have worked with one of the world's most recognized planning firms, DPZ, to propose a comprehensive plan for the site. The proposal for Lakeport Beach features a mix of housing types, from single family homes and townhomes, to bungalows, small cottages, apartments, and ground floor one-storey units for seniors. These will be built using authentic materials and classic architecture that focuses on people, not cars. Homes will feature front porches or stoops, and picket fences will delineate private vs public spaces.



The Lakeport Beach plan introduces a variety of components that we believe are necessary to create a complete community. Housing types will appeal to all types of families and to our aging population. Places to walk and explore nature are at the heart of the plan, as over 50% of the land at Lakeport Beach will remain green space—whether as forested areas with trails, large and small parks, natural playgrounds, or the 1.3 km of publicly-accessible pebble beach along Lake Ontario. Everyone will be welcome to walk, play, sit in the parks, and enjoy the beach. Landlab's proposal also includes a village-scale community hub where people can enjoy local shops and services. These amenities will be a short stroll or bike ride from all corners of the new community.

Landlab is currently engaging with the local community, Township and County officials, and local Indigenous communities. Several public community engagement sessions were held during 2022, and more information can be found on the Lakeport Beach [website](#).



**Illustrations of Landlab's proposed Lakeport Beach project*

LANDLAB RESPONSE TO ERO POSTING QUESTIONS

On behalf of Landlab Inc., please accept the comments below in response to ERO number 019-8462, "Review of proposed policies for a new provincial planning policy instrument" which represents the Province of Ontario's second draft of the proposed *Provincial Planning Statement*. In spring 2023, Landlab submitted a response to the first draft of the *Provincial Planning Statement*.

Upon reviewing the 2024 draft of the *Provincial Planning Statement* and reviewing the questions put forward by your Ministry, Landlab would like to highlight the following items which it believes will support your goals of reducing red tape, streamlining the planning process, and getting more homes built.

1. What are your overall thoughts on the updated proposed Provincial Planning Statement?

Based on Landlab's review of the 2024 draft of the *Provincial Planning Statement*, we believe that this consolidation and streamlining of the *Provincial Policy Statement* ("PPS") and the *Growth Plan for the Greater Golden Horseshoe* ("Growth Plan") represents a positive step forward for building more homes efficiently and faster.

Landlab's overall perspective on the most recent draft of the *Provincial Planning Statement* remains consistent with its review of the document's 2023 version: we believe that the Province is setting out a clear path forward to streamline the planning process and to encourage the provision of housing so as to ensure that Ontario can meet its goal of 1.5 million new homes by 2031.

SETTLEMENT AREA BOUNDARY EXPANSIONS

The simplification and streamlining of settlement area boundary expansions (SABE), particularly in rural areas, and in areas where there are clearly identifiable features which would support additional growth, is an essential component of delivering a large number of housing starts quickly. The extraordinary demand for housing in Ontario necessitates developers both proposing and building large new developments in relatively small rural communities. In many cases, this scale of development simply cannot be accommodated in existing, small, settlement areas, and requires additional land to be recognized as suitable for development.

The current process for SABEs is long, complicated and onerous, and requires approvals from both the lower and upper tiers of municipal government (where applicable). The process is also prone to interference from Not-In-My-Backyard (NIMBY) residents who resist change, and provide serious challenges for local councillors. It is incredibly challenging to effectively respond to misinformation. This has led to projects that would be fiscally, environmentally, and socially beneficial to a community being attacked as "not in keeping with the rural community character", bringing in too many new people, creating too much traffic, etc.

Rationalizing barriers to SABE and enabling appropriate expansions to existing settlement areas as well as the approval of new settlement areas, where it can be demonstrated that they are fiscally and environmentally responsible, is an important action which would allow rural municipalities to shoulder their fair share of Ontario's goal of 1.5 million new homes over the next 10 years.

The creation of new settlement areas, which should only be approved subject to the provision of adequate private (or public) services, will allow the opportunity

for denser and more efficient patterns of development than currently exist in some of the older settlement areas where the protection of the existing character is often an impediment to intensification.

Providing measurable criteria for where new settlement areas can be placed, such as a trusted professional evaluation that the proposal would provide a net benefit for the local economy and fiscal benefit for the municipality, would ensure that growth is managed appropriately, and new settlements meet the intent of the outdated regulations.

In Landlab's opinion, the Lakeport Beach proposal is an example of where a new settlement area is appropriate. The Lakeport Beach lands are located within a recreation-based resource area, adjacent to a pebble beach with over 1.3 kilometres of shoreline on Lake Ontario. The Lakeport Beach project would contain its own communal services which would be paid for only by the residents of the development. Landlab's independent economic consultants have analyzed and verified the numbers and have demonstrated that Lakeport Beach could not only support the required services but that it would be a net contributor to the municipal tax base.

However, existing rules on the expansion and establishment of settlement areas are based on old servicing technologies which are a barrier to new development. These old rules, which assume development would be based only on private well and septic technology, waste untold acres of land, and ultimately create a burden on municipal finances. In other words, adhering to the existing rules and regulations would mean using more than ten times the area for the same number of homes while wasting valuable shared recreation resources, creating a less healthy social and natural environment, and creating a net drain on municipal finances. This is one example, but there are hundreds across the Province of Ontario.

HOUSING MIX AND RESIDENTIAL DEVELOPMENT IN RURAL AREAS

Landlab supports the Province's goal of ensuring that new developments offer a wide-range of housing typologies and varying levels of affordability. In our view, enabling affordability requires that more dense developments are permitted, including in rural areas, to ensure that a sufficient number and mix of units may be constructed to enable developers to offer some below-market units by offsetting costs. This includes single family homes on small lots, townhouses, and stacked townhouses, formats that are typically prevented by current regulations.

While a greater mix of housing at higher densities may seem normal within the Greater Toronto Area, many rural municipalities are unfamiliar with these forms of homes and are often outright hostile to dense housing typologies for erroneous ideological reasons or simply because they are concerned about the risk that change brings. At the same time, very few councillors or staff in small communities would dispute the need for more affordable housing and for attainable housing that opens up opportunities to keep their community's next generation close to home.

NIMBY groups often argue these housing types should not be permitted because they do not match the old, estate-lot format with private on-site services. Paradoxically, this opposition is often most prevalent in areas where traditional villages exist and where those villages are themselves examples of a broad mix of housing types ranging from apartments above stores, to townhouses, to row houses and other denser housing types. It is often precisely this mix of housing that offers these villages the very character that NIMBYs most vehemently defend. Provincial support for a mix of housing typologies in developments across all of Ontario is essential for attaining provincial goals such as affordability, especially in rural communities and is absolutely consistent with the character of vibrant rural villages.

In accordance with the above, Landlab submits that the *Provincial Planning Statement* should contain clear direction which establishes that municipalities may direct growth and development, including more intense forms of growth and development, to rural areas. In this regard, Landlab proposes the following revisions to the policy language:

- 1. Section 2.6.1.c) of the version of the *Provincial Planning Statement* released in 2023 stated that permitted uses on *rural lands* include “residential development, including lot creation and multi-lot residential development” [emphasis added]. Landlab respectfully requests the re-insertion of the reference to “multi-lot residential development” at Policy 2.6.1.c).**
- 2. Proposed Section 2.5.2 states that “*rural settlement areas* shall be the focus of growth and development”, while proposed Section 2.5.3 states that “growth and development may be directed to *rural lands* in accordance with policy 2.6”. Section 2.5.3 should be revised to state that “Growth and development, including multi-lot residential development, may be directed to *rural lands*”.**

Landlab submits that these revisions appropriately recognize that *rural lands* can be suitable for more intense forms of development and intensification, and will help prevent rural municipalities that are otherwise opposed to growth from opposing ambitious development projects on *rural lands* that have suitable site conditions.



Townhomes at Landlab's Hendrick Farm project

AGRICULTURE

Landlab believes that the best way to protect prime agricultural land is through the efficient use of lower quality land where any potential conflicts with agricultural practices can be minimized. One way this can be achieved is by building more efficient residential communities in rural areas. This does not mean high-rise growth but, rather, density that reflects the community's potential. This can be enabled by increasing the number of units per hectare mandated for rural development, rather than reinforcing rules that incentivize low density development. This would require implementing new standards in local zoning by-laws that would allow for decreased setbacks from the road for housing, narrower and community-scale internal roads, and the elimination of minimum lot sizes. Increasing density on development land would dramatically lower pressure on sprawl and have an immediate and positive impact on the preservation of agricultural land.

NATURAL HERITAGE

Landlab supports natural heritage policies that strike a more appropriate balance than is currently achieved by the *Growth Plan*, which imposes onerous and disproportionate natural heritage requirements on developers at the expense of housing-focused outcomes.

Regarding the *negative impact* test, Landlab would ask that the *Provincial Policy Statement* include language that recognizes that there are a number of ways to resolve potential negative impacts through measures such as offsetting, financial compensation, or similar measures that can provide an opportunity to enhance other natural heritage features that are of greater value.



Landlab's 36-acre Hendrick Farm forest preserve

NATURAL AND HUMAN-MADE HAZARDS

Clear and streamlined policy directions for developing near hazards is an important part of speeding up the development process. Landlab believes that context-specific solutions should be actively considered to allow for reductions in riparian setbacks and other standards if it can be proved to both be compatible with development and enhance the natural environment.

INFRASTRUCTURE SUPPLY AND CAPACITY

Small and rural municipalities are often faced with insufficient infrastructure, such as water and wastewater facilities, which hinders the development of housing. The Province should take steps to reduce red tape for alternative and modern servicing solutions, such as modular wastewater systems, which can provide cost-efficient and easily implemented solutions that would allow housing construction to proceed faster and at higher densities than would be feasible through on-site servicing or connections to municipal water and wastewater services.

OUTCOMES FOCUSED

Landlab believes that the land use planning and development process in Ontario should, fundamentally, be streamlined and designed to ensure housing is built, not hinder its construction. A key element for ensuring that housing can be approved is to provide options for flexible and creative alternative solutions to impediments that may arise. Today, our land use regime is rigid and there is no consistency in the rules which can be applied between municipalities, meaning minor items can delay a housing project for months or years. Further options for municipalities, and/or the Province, to provide opportunities for flexibility and direction (where appropriate) on land use planning issues would ensure the entire planning system becomes more outcomes-oriented.

Further, Landlab supports the consolidation of the *PPS* and the *Growth Plan* into an integrated policy document as a means to achieve housing-focused outcomes. In Landlab's experience, having two separate provincial policy documents contributes to a planning framework that gives rise to conflicting interpretations, redundancy, and ambiguity, which causes problems and delays in the development process. Consolidating the *Growth Plan* and the *PPS* will help simplify and streamline the development

process and give developers, municipalities, and all other interested stakeholders a clear understanding of Provincial direction and priorities.

2. What are your thoughts on the ability of updated proposed policies to generate appropriate housing supply, such as: intensification policies, including the redevelopment of underutilized, low density shopping malls and plazas; major transit station area policies; housing options, rural housing and affordable housing policies; and student housing policies?

Many municipalities, particularly in rural areas, lack zoning bylaws which allow for housing typologies that enable the efficient use of space on development lands. The Government of Ontario, through the *Provincial Planning Statement* and other initiatives, should work to streamline the process for developers to amend local zoning bylaws to enable reduced setbacks, smaller lot size, and smaller internal roads tailored to the unique communities they serve. These factors would allow for greater housing densities, and a broader mix of housing typologies. This would help to create opportunities for developers to offer homes to suit the needs of more types of future residents and help to deliver attainable housing.



3. What are your thoughts on the ability of the updated proposed policies to make land available for development, such as: forecasting, land supply, and planning horizon policies; settlement area boundary expansions policies; and employment area planning policies?

FORECASTING

Landlab understands that planning for growth requires a deliberate and forward-looking approach and should rely on evidence-based decision-making. An important part of this process is having a reliable, province-wide set of data to make these decisions. Landlab applauds the Province of Ontario's decision to require local municipalities to plan for growth based on the Ministry of Finance's 25-year growth projections as outlined in section 2.2.1.

Landlab would, however, encourage the Province to provide more guidance on the circumstances under which a municipality could differ from these targets. In its experience, some municipalities resist growth, and thus might identify policies in the *Provincial Planning Statement* which would allow them to modify their 25-year Ministry of Finance growth projects downwards. In this way they could oppose additional development and ignore the irrefutable evidence that Ontario is facing a housing supply crisis.

LAND SUPPLY AND PLANNING HORIZON POLICIES

Planning for growth and ensuring that a sufficient supply of developable land is available for growth is important for both ensuring municipalities can accommodate the demand for new housing, and for providing flexibility for locating that growth. Landlab

supports the proposed 20-year minimum planning horizon and appreciates the potential for municipalities to plan for a 30-year horizon. We believe this could provide additional flexibility for where growth can occur, and the inclusion of more lands suitable for development.

SETTLEMENT AREA BOUNDARY EXPANSION POLICIES

Rural Ontario must play an important role in supporting the Government of Ontario's ambitious housing targets, and much of the required growth cannot be accommodated in existing rural settlement areas. Landlab believes that to deliver a large number of homes and new housing starts across Ontario quickly, more flexibility is required in rural areas and in areas which can clearly support more homes.

Landlab believes that when planned correctly, new settlement areas are both appropriate and a valuable tool for helping Ontario reach its goal of building 1.5 million homes over the next decade. Therefore, it strongly supports the proposed changes to the 2024 draft *Provincial Planning Statement* section 2.3.2 which enable the establishment of new settlement areas.

Provisions outlined in the updated document that municipalities must take into account when considering new settlement areas, such as requiring planning authorities to plan for additional land to accommodate a range and mix of uses, are important for accommodating vibrant communities which deliver a wide-range of homes for existing and future residents. Other provisions relating to reducing the impact on agricultural lands through options for impact mitigation are also important, to ensure that these new settlement areas can continue to co-exist with the rural communities and contexts that they will be built within.

Landlab also supports the proposed *Provincial Planning Statement's* provision that new settlement areas can only be established where appropriate

supportive infrastructure exists. The proposed policies allow this infrastructure, including water and wastewater services to be delivered and operated by the private sector in new settlement areas, which both helps to advance new housing projects faster, and can relieve local municipalities of additional costs associated with development.



4. What are your thoughts on updated proposed policies to provide infrastructure to support development?

Ontario's small and rural municipalities are experiencing significant growth yet are not equipped to accommodate this growth due to insufficient water and wastewater infrastructure. The Province should continue to reduce red tape and streamline the permitting process to allow creative servicing solutions, such as modular water and wastewater systems. These solutions can be delivered quickly and efficiently, and ensure that new communities can get shovels in the ground faster.

WHAT ARE YOUR THOUGHTS ON UPDATED PROPOSED POLICIES REGARDING THE CONSERVATION AND MANAGEMENT OF RESOURCES, SUCH AS REQUIREMENTS TO USE AN AGRICULTURAL SYSTEMS APPROACH?

Landlab's approach to development is focused on building communities which use land efficiently and respect local natural features. In our opinion, building dense and liveable new communities is the best way to preserve agricultural land. At Lakeport Beach, the original application was for sprawling estate lots on private services which would have delivered less than 10% of the new homes proposed in Landlab's current plan. Landlab believes that the original approach does not reflect today's needs and that the best path forward is to promote a more efficient development pattern on full services: this the approach that Landlab puts into practice every day.

5. What are your thoughts on any implementation challenges with the updated proposed Provincial Planning Statement? What are your thoughts on the proposed revocations in O.Reg. 311/06 (Transitional Matters - Growth Plans) and O.Reg. 416/05 (Growth Plan Areas)?

Landlab is of the view that the *Growth Plan* does not apply to the Lakeport Beach Project, given the date of its submission, but it fully supports transitional rules which clearly establish (1) that all land use planning decisions made after the new *Provincial Planning Statement* comes into force must be consistent with the *Provincial Planning Statement*, and (2) that the *Growth Plan* and the 2020 PPS do not apply to any land use planning decisions going forward, regardless of when an original application was made. A clear transitional framework will prevent disputes about which policies apply and which policies take precedence in the event of a conflict, and would ensure that all future land use planning decisions are consistent with the provincial direction contained in the proposed *Provincial Planning Statement*.

