

Aura Group of Companies

May 12, 2024

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

RE: ERO 019-8462 *Review of Proposed Policies for a new Provincial Planning Policy Instrument*

We are the owners of a property in the Town of Innisfil, Simcoe County, at the municipal address of 7214 5th Side Road. We have been active participants in the Simcoe County growth plan conformity exercise and municipal comprehensive review over the past several years. We would like to submit our brief comments and feedback on the proposed *Provincial Planning Statement* (“new PPS”) that is open for an additional consultation period at this time.

The proposed new PPS is overall a very positive and strong step forward in achieving an improved land use planning approval system, reduces duplicity of provincial and municipal policy frameworks, and has the potential to deliver on the significant need to increase housing supply and make more land available for re-development opportunities of both residential and employment uses. We would like to take this opportunity to comment briefly on aspects of the new policy statement that we support and applaud as the province considers any further modifications or revisions that stem from the consultation.

Policy 2.3 - Settlement Areas and Settlement Area Boundary Expansions

The proposed PPS facilitates greater opportunities for the ability to expand the settlement area boundary of a municipality on an as-needed basis. Under the previous Provincial Policy Statement (“former PPS”) and A Place to Grow: Growth Plan for the Golden Horseshoe (“Growth Plan”) regime, settlement area boundary expansions were only permitted to be considered at certain times or under certain circumstances. We are very supportive of the removal of the municipal comprehensive review process from the new PPS, which allows for opportunities to apply for privately initiated boundary expansion applications at any time by way of application for an official plan amendment.

Additionally, the Growth Plan previously restricted privately initiated expansion requests to be under 40 hectares or less; the removal of this stipulation to allow boundary expansions of any size to be applied for is a significantly positive amendment that will allow for streamlined development applications, better opportunities for developer-municipal relations, and reduced red tape that otherwise was a result of the necessity to apply for multiple expansion requests of 40 hectares at a time under the former policy regime.

With the repeal of the Growth Plan in its entirety, and the replacement with progressive policies in the new PPS, the ability to expand the settlement area is established and is no longer limited to a maximum request of 40 hectares. Further, the criteria to consider when evaluating an expansion request has been appropriately updated.

Policy 2.8 Employment

We are supportive of the ability for municipalities to consider the removal of lands from employment areas, and the facilitation of additional opportunities for employment and residential uses to coincide with one another. The new PPS includes policies that promote enhanced opportunities for mixed use re-development, with a focus on supporting increased intensification around transit and the re-development of low-density commercial plazas and strip malls. It also includes policies that allow for the removal of lands from employment areas based on criteria which ensures the removal does not compromise the ability to achieve employment targets nor result in land use compatibility issues.

This approach is appropriate and avoids the need to wait for a significant time period to change employment lands. The ability to remove surplus lands from employment areas in favour of housing (where there is a demonstrated need) is an important process which should be made available at any time. We are also very supportive of the re-definition of what constitutes an 'employment use' found in both the new PPS and as re-defined under Bill 97, as certain types of what were formerly considered 'employment' uses are now able to better coincide and compliment housing opportunities to provide for more mixed use developments and places for people to live close to where they work.

However, without the ability to appeal there is no incentive or motivation for municipalities to consider such types of requests. We are strongly in support of future changes made through other legislative vehicles that would complement the policies of the new PPS. Enabling the ability for employment conversion requests to be appealable would be a positive next step to balance the modifications made to the PPS, similar to the changes that are proposed to be made through Bill 185 which allow for the ability to appeal a privately initiated boundary expansion. The appeal process should be considered to be incorporated within the PPS and implementation should be effected through parallel amendments to the Planning Act.

Policy 3.6 Sewage, Water and Stormwater

The new PPS is directing municipalities to integrate servicing and land use considerations at all stages of the planning process, including giving consideration of opportunities to allocate, or re-allocate unused servicing capacities of municipal water services and municipal sewage services to meet current and projected needs for increased housing supply. This policy direction will be extremely important in ensuring the achievement of projected housing needs. The ability to allocate and re-allocate unused servicing capacity may open up new areas for both employment and residential re-developments which otherwise may not be possible due to limited capacities which are allocated to historic development applications that may not have been realized due to market demand never materializing. We would further suggest that should a municipality fail to provide allocation to opportunities that will significantly increase housing supply or provide for affordable housing projects, the Minister should be empowered to issue an order to mandate such allocation.

Conclusion

The provision of increased opportunities for bringing land supply online for housing and job creation through the efficient use of land is essential and must be a priority when considering competing policy objectives in municipal planning environments. 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. Municipalities that are projected to soon be 'fast-growing' should be considered as additions to the list of large and fast-

growing municipalities (including but not limited to Innisfil) and consequently housing and employment forecasts should be issued for these municipalities.

We are strongly in support of the removal of the municipal comprehensive review process from the new PPS and accordingly, providing the ability of planning authorities to make decisions on settlement area boundary expansions and conversions of employment areas at any time, as well as allowing for boundary expansions of any size to be applied for. We also applaud the coinciding Planning Act change that provides for the ability to appeal privately initiated settlement area boundary expansions, and we would strongly encourage the Province to consider a similar policy change that allows for the appeal of employment conversion requests in turn.

Thank you for the opportunity to comment on the proposed new Provincial Planning Statement.

Submitted by:
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