



May 9, 2024

By Email: growthplanning@ontario.ca
Provincial Land Use Plans Branch
13th Floor, 777 Bay St
Toronto, ON M7A 2J3

RE: ERO Posting 019-8462

Thank you for providing the opportunity for the Western Ontario Wardens' Caucus to comment on ERO Posting 019-8462 on the proposed 2024 Provincial Planning Statement through the Environmental Registry of Ontario.

The Western Ontario Wardens' Caucus and our fifteen upper and single tier municipalities are committed to enhancing the prosperity and overall well-being of rural and small urban communities across Western Ontario. The WOWC wishes to express its support for the Province's recent efforts and measures toward increasing housing supply throughout Ontario over the next 10 years.

Many of our partner municipalities deliver planning services to lower tier municipalities as well as a range of housing services, including the construction of County owned/operated housing.

This letter outlines PPS policy modifications perceived as advantageous by the WOWC and its partnering municipalities, as they contribute to bolstering the availability of affordable housing in the region. Additionally, it underscores areas of concern that could impede our capacity to efficiently plan for cohesive communities and safeguard natural and agricultural resources.

Agriculture Policy Changes

In our collective efforts to increase our supply and affordability of housing it must be understood that the landscape across rural Western Ontario includes significant swaths of rural and agricultural lands, including prime agricultural areas. The WOWC encourages the protection of Ontario's prime agricultural areas for their long-term agricultural use as a key objective. The removal of the permission to create up to three residential lots in prime agricultural areas is greatly appreciated.

The proposed PPS mandates the allowance of up to two Additional Residential Units (ARUs) on lots within Prime Agricultural Areas where residential dwellings are permitted. Newly introduced stipulations require these ARUs to be "limited in scale" and to "minimize land use for non-agricultural purposes."

We recommend that the wording of the proposed new policy be changed to "up to two additional dwelling units may be permitted," instead of the current language of "shall be permitted".

We appreciate the proposed policies that advocate for the clustering of Additional Residential Units (ARUs) and aim to minimize their impact on farmland.

In addition, the proposed maximum of two ARUs per farm lot needs to be clarified to indicate that only one of those units is permitted in an ancillary structure (i.e. the other must be located within the principal dwelling) which would be consistent with the direction on ARUs in settlements and minimize the impact to agricultural lands/operations. A further best practice would be to limit ARUs to a maximum of two per farm operation (i.e. regardless of the number of parcels comprising that farm operation).

The surplus farm dwelling severance policy (4.3.3.1 c) needs to be clarified to include all dwellings, principal plus ARU can be severed as a residence surplus to an agricultural operation and that no further severance would be permitted from the cluster.

The suggested amendments to the PPS policy, mandating an “agricultural systems approach,” offering guidance on Agricultural Impact Assessments, and bolstering support for the agri-food network, are all viewed favorably and embraced.

Employment Lands

The narrowing of the Employment Areas definition risks eliminating protection for business parks, encompassing lighter industrial, institutional, and office uses. Such a change might present economic development hurdles for municipalities. Revising existing planned land uses and infrastructure within municipal Official Plans may become necessary, potentially incurring additional expenses if new Employment Areas must be identified.

Given that planning authorities may designate lands for employment purposes beyond a 30-year horizon, there is a requirement for added clarity to assist rural and small urban municipalities in gauging the necessary supply of Employment Lands over the long term. A substantial surplus of employment lands would be essential to justify the removal of employment areas.

While the proposed policies offer municipalities increased flexibility, the infrastructure and servicing expenses associated with industrial lands impose significant financial burdens. Slower-growing rural and small urban municipalities may struggle to manage the infrastructure costs of a larger supply of Employment Lands that distinguish between protected employment lands and broader areas where people work. Flexibility in converting employment lands, where suitable, can be attained without narrowing the definition of employment.

Considering that the Ministry of Finance growth projections do not include employment forecasting, we look forward to the Province providing further guidance to municipalities on employment forecasting.

Settlement Area Boundary Expansions

The proposal suggests eliminating municipal comprehensive reviews as a prerequisite for settlement area boundary expansions. This marks a notable departure, as comprehensive reviews have been a fixture since the 2005 Provincial Policy Statement. The WOWC views the increased flexibility for municipalities to contemplate settlement boundary adjustments outside of Official Plan Reviews positively. Such flexibility enables partner municipalities to address the distinct growth requirements and demands of individual settlement areas, which may not be adequately captured through regional market studies or population projections.



The WOWC remains steadfast in urging the province to acknowledge the vital role of infrastructure in fostering growth within settlement areas. Securing funding support for infrastructure to meet the demands accompanying settlement area boundary expansions is paramount for municipalities. The proposed policies within the PPS could exert substantial pressure on municipal infrastructure, including sewage and water systems, roads, bridges, and stormwater management. Access to supportive provincial funding and expedited approval processes for both replacement and new infrastructure is essential for municipalities to effectively accommodate projected growth.

Summary

As always, the WOWC appreciates the opportunity to comment on the proposed policy changes and looks forward to working with the provincial government and our municipal counterparts to protect Western Ontario's agricultural land while sustaining and growing Ontario's housing supply.

When we work collaboratively together our communities reap the rewards.

Sincerely,

Glen McNeil
Chair, Western Ontario Wardens' Caucus

cc.

Minister Paul Calandra
MPPs Western Ontario
Association of Municipalities of Ontario
Western Ontario Municipalities