

May 10, 2024

Sent via email to: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

**The Honorable Paul Calandra,**  
Minister of Municipal Affairs and Housing, Ontario  
777 Bay Street, 17th Floor  
Toronto, ON M7A 2J3 Dear  
Minister Calandra,

**Re: Draft Provincial Policy Statement, 2024**

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I am the land-use planning consultant for the Ahmed Group, a developer specializing in purpose-built rental apartments within the City of Mississauga.

**Policies Should Support Intensification in Proximity to Highway Interchanges to Utilize Highway Transportation Capacity**

Properties in proximity to provincial highway interchanges benefit from the substantial transportation capacity that the highway offers. To ensure optimal use of this high transportation capacity, this property should be considered a candidate for a strategic growth area. For this reason, among others, I request that the words "highway interchanges" be added before "major roads" in the strategic growth area definition.

**Intensification Throughout the Built-Up Settlement Area**

The policy 2.2.2.3 c of the A Place to Grow Plan requires municipalities to "encourage intensification generally throughout the delineated built-up area". This policy recognizes that to meet future housing needs, provincial policies need to continue to support continued intensification outside of the designated urban centers and major transit station areas. Intensification throughout the settlement areas continues to be a valid provincial policy objective and results in optimal use of existing infrastructure. The A Place to Grow Plan will be repealed when the new draft Provincial Policy Statement 2024 is proclaimed. For this reason, we request that a policy substantially the same as the existing policy 2.2.2.3 c in the A Place to Grow Plan be added to the Draft Provincial Policy Statement, 2024.

**A Policy Is Required to Provide Residents the Ability to Age Within Their Existing Communities by Requiring Municipalities to Plan for the Diversification of the Overall Housing Stock Across All Municipalities**

The policy 2.2.6.2 d) in the A Place to Grow Plan requires that municipalities support the achievement of complete communities by "planning to diversify their overall housing stock across the municipality". In my opinion, this policy supports the introduction of seniors-oriented apartment buildings within predominantly low-density single-detached residential communities to achieve more complete communities. This provides people residing within an existing low-density residential community the opportunity to continue residing

within their existing community as they age by moving out of low-density homes into a seniors-oriented apartment building. We believe that aging in place within an existing residential community and diversifying the type of housing accommodation available across the municipality remain valid policy objectives. Therefore, we request that a policy be added to the Draft Provincial Policy Statement, 2024 that maintains the obligation on municipalities to continue to plan to diversify their overall housing stock across the municipality.

**Complete Communities, Minimizing Greenhouse Gas Emissions, and a Policy Indicating That No Avoidance for Major Facilities and Sensitive Land Uses Is Possible In Those Cases Where Other Policy Statements Are Met**

To minimize greenhouse gas emissions from vehicular traffic, it is desirable that sensitive uses such as high-density residential redevelopments be permitted within Major Transit Station Areas to optimize the use of public transit. Similarly, it is desirable to locate sensitive uses such as high-density residential redevelopments within walking distance of major facilities to minimize the length of employee trips between their place of residence and their place of employment. By minimizing the length of such employee trips, the employees are more likely to walk or use other active modes of transportation for trips to work. Further, by locating sensitive uses such as high-density residential redevelopments within walking distance of major facilities, it helps create more complete communities where people can fulfill their daily needs within a 15-minute walk of their place of residence. We recognize that in some instances, land use compatibility between sensitive uses and major facilities can be achieved and in other instances, land use compatibility is not possible. For example, tall residential buildings within walking distance of major facilities in proximity to airports shall endanger the safety of the building occupants if the buildings exceed the maximum building height limits in airport zoning regulations for airport flight paths, and residential buildings are not suitable in other locations close to airports because of aircraft noise. However, sensitive land use such as high-density residential buildings can be compatible with industrial uses which constitute Major Facilities. Policy 3.5.2 in the Draft Provincial Policy Statement, 2024 identifies the criteria that must be met where the avoidance between Sensitive uses and Major Facilities is not desirable for the reasons summarized above, among others. These policy criteria address land use compatibility between such sensitive uses and major facilities and the Ontario Ministry of the Environment, Parks, and Conservation has noise, as well as air emission guidelines which implement these policy criteria. Given the foregoing, we request that policy 3.5.1 in the Draft Provincial Policy Statement, 2024 be reworded as follows:

"Major facilities and sensitive land uses shall be planned and developed to avoid each other where their coexistence is undesirable and where avoidance is undesirable, minimize and mitigate any potential adverse effects from odor, noise, and other contaminants, minimize risk to public health and safety, and ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards, and procedures."

**Reduced Parking Standards in Major Transit Station Areas**

The policy in section 2.2.6.2 d) of the A Place to Grow Plan states that within all major transit station areas development will be supported where appropriate by providing alternative development standards, such as reduced parking standards. To achieve the policy objective related to compact, transit-supportive development within major transit station areas, a similar policy should be added to the Draft Provincial Policy Statement, 2024.

**Where Built Heritage Resources and Cultural Heritage Landscapes Have Such Limited Value That**

### **Alteration, Development, and Redevelopment Should Be Permitted**

The policy in Section 4.6.1 of the Draft Provincial Policy Statement, 2024 states, “Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.” The Draft Provincial Policy Statement, 2024 defines the term conserved as follows:

“**Conserved:** means the identification, protection, management, and *use of built heritage resources, cultural heritage landscapes, and archaeological resources* in a manner that ensures their cultural heritage value or interest is retained. This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that has been approved, accepted, or adopted by the relevant planning authority and/or decision-maker. Mitigative measures and/or alternative development approaches should be included in these plans and assessments.”

This definition of conserved does not address cases where a heritage impact assessment concludes that a property does not meet provincial guidelines for designation as a heritage property by a municipal by-law and that the alteration or demolition and redevelopment of an existing building will have no adverse impact on any elements of cultural heritage value. Similarly, this definition of conserved does not address cases where a heritage impact assessment concludes that a specific property does not have cultural heritage value as a cultural heritage landscape. My client has properties for which the municipality has requested a heritage impact assessment to determine if one redevelopment site has cultural heritage value as a built heritage resource and another vacant development site has cultural heritage value as a cultural heritage landscape. In both cases, the heritage impact assessments for these two properties have concluded that they have no cultural heritage value. To be able to clearly demonstrate that the redevelopment or development of these sites conforms to the policy in Section 4.6.1 of the Draft Provincial Policy Statement, 2024 we request that the following statement be added to the definition of the term conserved in the Draft Provincial Policy Statement, 2024:

“In cases where a heritage impact assessment determines a property has no cultural heritage value as a built heritage resource or as a cultural heritage landscape, building redevelopment and site alteration shall be permitted.”

Yours truly,

**PLAN LOGIC CONSULTING INC.**



Per: \_\_\_\_\_

John Lohmus, MCIP, RPP Director