



County of Middlesex  
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It is acknowledged that the provision of housing is important and that municipalities play a key role in increasing the supply of housing while building complete and sustainable communities. Even a few years ago the question of housing affordability would have been a low priority for our community as this challenge was largely an issue for our large urban neighbour. This is no longer the case as our rural and small urban County has significant housing affordability and attainability challenges that in many respects have outpaced our urban neighbour. This submission will outline comments based on a review of the draft Provincial Planning Statement by staff. The comments are focused on the proposed changes that are anticipated to be the most consequential to Middlesex County.

### **Pre-Application Consultation**

The Province is proposing amendments to the Planning Act that would remove the ability for municipalities to require pre-application consultation and make the process voluntary, at the discretion of the applicant. The complete application provisions of the Act would remain unchanged and the ability for applicants to appeal the municipality's determination of a complete application are proposed to remain, however the current 30-day time limit for such appeals would be eliminated.

The requirement to pre-consult and complete application requirements have not been a particular point of contention in Middlesex County, but rather the opposite. Pre-application consultation meetings have been found to be beneficial for both the municipality and the applicant. Such meetings are where complete application requirements are communicated to applicants from all applicable stakeholders. Generally, any disagreement on such requirements would be dealt with and a resolution agreed upon by the meeting's end. This practice has had great success in Middlesex County and has facilitated positive outcomes including but not limited to reduced time and expenses for applicants and ultimately a more expeditious approvals process.

### **Pre-1995 Draft Plans of Subdivision**

The Province is proposing amendments to the Planning Act that would result in the lapsing of draft plan approvals that occurred prior to 1995, if not registered within the next three years. Middlesex County is generally supportive of this amendment given that there are a number of legacy plans that exist within the County that would be impacted by this proposal and that have generally been stagnant for many years. This may entice owners to start developing these lands or open additional and perceivably 'shovel ready' land to new development.

### **Proposed Provincial Planning Statement**

#### **Agricultural Policies**

##### **Agricultural Systems-Based Approach**

The agricultural policies in proposed provincial planning statement largely reflect the existing policies of the PPS (2020) save and except for a few notable changes. The planning statement proposes to require that municipalities use an agricultural system-based approach, based on



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provincial guidance, whereas prior, municipalities outside of the Greater Golden Horseshoe were encouraged to use an agricultural system-based approach. This approach may have merit however it is noted that this is an area that would benefit from additional direction and guidance from the Province on appropriate implementation within the context of southwestern Ontario.

#### Additional Residential Units

The proposed planning statement provides that additional residential units are permitted in agricultural areas, subject to criteria, and would be severable, subject to criteria. Middlesex County is generally supportive of this direction given that the County and several local official plans permit the development of additional residential units on farms. However, staff are unclear of what is meant by 'limited in scale' as well as the Province's intent of the proposed lot creation policies. Additional direction and guidance through a provincial guideline (similar to OMAFRA's Permitted Uses Guideline) would greatly assist municipalities in local implementation, increased consistency across municipal boundaries, and would provide the public with supplemental information as well.

#### Surplus Farm Dwelling Severances

The surplus farm dwelling severance policies of the proposed planning statement largely reflect the policies of the PPS (2020), except for the clarification that the creation of a lot for 'up to one residence surplus to an agricultural operation per farm consolidation' may be permitted, subject to criteria, whereas prior the policies did not specify one dwelling per farm consolidation. Again, Middlesex County is generally supportive of this clarification, it is however unclear how such a policy would be applied over time when ownership of farm parcels change and subsequent consolidations occur. Additional clarification in this regard would greatly assist municipalities in responding to this change, should it be approved as proposed.

#### **Growth Management Policies**

While the proposed planning statement requires that municipalities base population and employment growth on the Ministry of Finance 25-Year projections, additional technical guidance in this regard would be of assistance. The current projection methodology guideline was issued in 1995 and does not reflect current provincial priorities or the current planning framework. The updated guideline should reflect current priorities and circumstances, be adaptable to all communities including rural communities and should provide a framework that would streamline the projections process in a consistent manner across all municipalities.