



Friday May 10, 2024

**Ministry of Municipal Affairs and Housing**

Provincial Land Use Plans Branch

13th Floor, 777 Bay St

Toronto, ON M7A 2J3 Canada

**RE: ERO File No: 019-8462  
Review Of Proposed Policies For A New Provincial Planning Statement Policy Instrument.**

On behalf of Cachet Homes Corporation, we are pleased to submit this letter in response to the Ministry of Municipal Affairs and Housing regarding the review of proposed policies for the new Provincial Planning Statement Policy. Cachet Homes is a fully integrated residential developer and homebuilder with a pipeline of approximately 8,000 housing units in several communities across Southwestern Ontario including the City of Brantford, City of Hamilton, County of Wellington, Region of Waterloo, Oxford County and the City of Stratford. Our objective and purpose is to make the dream of homeownership a reality for Canadians.

We understand that ERO File No. 019-8462 is seeking additional comments on the updated Provincial Policy Statement (PPS). As such, Cachet Homes wishes to submit the following comments, concerns and recommendations in response for consideration in future policy changes and revisions.

1. Settlement Area Boundary changes at any time;

The New PPS is proposing to facilitate greater opportunity to expand the settlement area on an as-needed basis. Currently, the Growth Plan permits settlement boundary expansions up to 40 hectares in advance of a Municipal Comprehensive Review. With the repeal of the Growth Plan and replacement with policies from the New PPS, the ability to expand the settlement area is established and no longer limited to a maximum request of 40 hectares. Further, the criteria to consider when evaluating an expansion request has been appropriately updated. Cachet Homes supports this policy initiative as it will increase the available supply of land and probability of housing units in the market.

2. Elimination of Provincially Significant Employment Zones and consideration to remove employment lands;

It is our understanding that through the elimination of the Growth Plan, policies associated with Provincially Significant Employment Zones (PSEZ) would also be repealed and eliminated. While PSEZ's offered added protection for employment lands, the zones offered little flexibility or ability to shift and adjust to market demands for either housing or employment. The removal of the PSEZ's alongside added policies for municipalities to consider employment land removals outside of an MCR process will ensure there is flexibility in the planning process associated with employment areas, and allow those



areas to adapt and adjust to market trends and demands, particularly for housing. Cachet supports this policy direction to allow municipalities more flexibility to address lands needs for both employment and residential uses.

3. Airport Noise and regulations;

Based on our review, we recommend that the province adopt modifications to the noise related policies in the PPS, such that they remain consistent with other federal and provincial policy documents. We suggest removing Section 3.4(2)(a) from the document entirely, and allowing development to proceed above the NEF30 noise contour as prescribed in other provincial and federal documents, provided those uses are not a hazard to the safety and operation of the airport. Similar language from the Transport Canada documents would be appropriate, given that similar language is already considered in Section 3.4(b) for “redevelopment” adjacent to airports above the NEF30 noise contour. These proposed revisions will allow for greater clarity and certainty around land uses and promote the redevelopment for residential uses where technically feasible.

Overall, we believe the proposed PPS is a step in the right direction in achieving an improved land use planning instrument for the Province, which would contribute to holistic solutions for the Ontario’s housing crisis.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, reading "M Gagliardi".

**Marcus Gagliardi**

**Senior Land Development Manager**

**Cachet Homes**