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May 10, 2024

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**Response to ERO Posting 019-8462 (Review of proposed policies for a new provincial planning policy instrument)**

The Region of Waterloo is a key partner to the Province of Ontario, as we plan for growth and housing. Recently an updated proposed Provincial Planning Statement was released that would integrate policies from the existing Growth Plan for the Greater Horseshoe (2019) and the Provincial Policy Statement (2020). The intent was to develop a singular, streamlined land-use planning policy document for Ontario.

The PPS 2024 generally maintains the key policy proposals of the original PPS 2023, however, there have been several policy changes that respond positively to stakeholder feedback received through consultation on the PPS 2023 as outlined below:

- Requiring municipalities to base population forecasts on Ministry of Finance population projections, with transition for municipalities in the Greater Golden Horseshoe, including Waterloo Region, to continue to use forecasts issued by the Province through the Provincial Growth Plan until more current forecasts are available to 2051. The PPS 2023 did not outline a prescribed forecast, which may have resulted in inconsistency in approach.
- The Province has not indicated when and how Ministry of Finance population forecasts will be updated, if the population projects will be treated as forecasts and assign population and employment at the area municipal level, and how these forecasts will align with Regional infrastructure and service planning. Continued coordination and collaboration between the Region and area municipalities will be critical to implement the forecasts.
- Requiring municipalities to plan for a minimum 20-year horizon but not more than 30 years, maintain a 15-year residential land supply and maintain land with servicing capacity for a 3-year supply of residential units. The PPS 2023 included the 20-year minimum but did not establish a cap on the planning horizon.
- Permitting municipalities to identify a new settlement area where it has been demonstrated that the infrastructure and public service facilities needed to support

development are planned or available. The original PPS 2023 proposal required municipalities to “consider” the capacity of existing or planned infrastructure.

- Requiring municipalities to establish local targets for affordable housing based on reinstated definitions for affordable housing and low- and moderate-income households. The PPS 2023 proposed to delete the Province’s long-standing definition of affordable housing, and to no longer require municipalities to set targets for building any affordable housing in their communities. The current Regional Official Plan provides direction to plan to provide a diverse range and mix of housing options, with an overall target of a minimum of 30 percent of new ownership and rental housing being affordable to low- and moderate-income households.
- Not carrying forward proposed policies permitting lot creation in prime agricultural areas. The PPS 2023 proposed to allow the severance of up to three new residential lots from an existing farm parcel in a prime agricultural area, subject to conditions.
- Requiring municipalities to use an agricultural systems approach in planning for agriculture. The PPS 2023 “encouraged” municipalities to use such an approach. The direction to use an agricultural systems approach would be carried over from the current Growth Plan. This change would better protect the geographic continuity of the region’s agricultural land base and help support the agricultural sector.
- Enhancing the criteria for allowing up to two additional residential units on a lot in a prime agricultural area without creating any new lots. The enhanced criteria would require any additional residential units to be of “limited scale” and “minimize land taken out of agricultural production”, which the original PPS 2023 did not require.
- Requiring municipalities to protect airports by prohibiting land uses that may cause a potential aviation safety hazard. The original PPS 2020 and draft PPS 2023 required municipalities to “discourage” such land uses and proposed the change in language appears to be a recognition by the Province of the increasing importance of protecting for airport operations and ensuring airplane safety.
- A new requirement for all municipalities to consider opportunities to allocate, or reallocate, if necessary, the unused servicing capacity of municipal water services and municipal sewage services to accommodate projected needs for an increased housing supply.

In response to the Province’s request for feedback, on May 24, 2023, Regional Council adopted Report PDL-CPL-23-011.1 as the Region’s comments on the proposed PPS 2023. In general, the staff report noted that in the absence of mechanisms to coordinate growth at the regional scale, the Province’s proposed PPS 2023 could potentially weaken strategic decision making on a wide range of Regional services, including transit, assisted housing, public health, economic development, and infrastructure such as sewers, waters, and roads. These mechanisms continue to be absent in the draft PPS 2024. To ensure effective coordination with Regional services, the Province should consider revising the PPS 2024 to explicitly emphasize the need for collaboration across all levels of government. Improved collaboration would also enable governments to coordinate, plan and deliver new infrastructure a financially sustainable manner.

The Region of Waterloo appreciates the opportunity to engage throughout this process and is a partner in moving our shared goals forward.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Rod Regier". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rod Regier

Commissioner, Planning, Development and Legislative Services