



May 10, 2024

Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON M7 A 2J3

RE: Environmental Registry of Ontario Posting ERO [019-8462](#) – Proposed Updates to the Proposed Provincial Planning Statement

The Town of Caledon welcomes the opportunity to provide feedback on an updated streamlined province-wide land use planning policy framework that incorporates the housing-focused policies of the Provincial Policy Statement, 2020 (Provincial Policy Statement) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019 (A Place to Grow).

Caledon supports the Province's goals of livable communities, a thriving economy, a clean and healthy environment and social equity, and improving the quality of life for all. It is one of the largest lower-tier municipalities in the Greater Golden Horseshoe, with a land area of 688 square kilometres. The Province and Region of Peel have both identified Caledon as a major growth area, as the population is projected to grow from approximately 81,000 (2021) to 300,000 by 2051, making it one of the fastest growing municipalities in Canada.

Given its distinct geography and quickly growing population, Caledon has an important stake in provincial efforts to shape and accelerate housing development. Caledon represents small but rapidly growing municipalities faced with the challenge of vastly scaling approval processes, development, and enabling-infrastructure to meet growing population pressures. As urbanization accelerates, municipal readiness is important for the continued economic and social development of the province as a whole.

Collaboration with municipalities and consideration of local needs has contributed to strong and sustainable policy in the past. To this end, the comments included in Appendix 1 serve as a channel to further support the province in understanding and addressing local needs.

I would be happy to discuss these comments in more detail as necessary, please do not hesitate to contact me with questions or requests for clarification.

Sincerely,
Eric Lucic
Commissioner of Planning and Development and Chief Planner

Appendix 1 Town of Caledon Response to ERO Posting 019-8462

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Generate Increased Housing Supply

- Encourage all municipalities to focus growth and development in strategic growth areas to achieve higher density outcomes (updated)
- Remove the requirement for large and fast-growing municipalities to identify and set out density targets (updated)
- Remove direction for planning for urban growth centers, with simplified direction to plan for downtowns as strategic growth areas (updated)

Comments

The Town is concerned that the collective impact of not releasing mandated growth forecasts, allowing growth targets to be minimums, eliminating intensification targets and permitting settlement boundary expansions at any time means that there are few constraints on how much land can be released. These removals should be rolled back to ensure that land is developed efficiently and effectively.

- Require municipalities to direct development to rural settlement areas, and provide more flexibility for municipalities to service residential development in rural settlement areas (updated)

Comments

The Town suggests this policy should be modified to be a “may” policy. Caledon has many rural settlements and does not intend to direct significant development towards the majority of these settlements. There are often concerns relating to servicing, community concerns, infrastructure, community facilities, transit and transportation that would make development in these areas undesirable and cost inefficient or prohibitive at this time. Caledon Official Plan policies limit the growth directed to rural settlements.

Make Land Available for Development

- Require municipalities to base growth forecasts on Ministry of Finance population projections (new), with transition for municipalities in the Greater Golden Horseshoe to continue to use forecasts issued by the province through Schedule 3 of A Place to Grow until more current forecasts are available to 2051, as informed by guidance provided by the province (updated)
- Guidance for projecting population and related land requirements may be updated after finalization of the proposed Provincial Planning Statement to reflect final policy direction and considering feedback received.

Comments

Caledon has significant concerns with this proposal as Ministry of Finance projections do not include employment and are updated annually. These projections are not land-based, as were

the ones prepared for the Growth Plan. This would impact Peel Transition discussions around integrated infrastructure planning post Bill 23.

- Provide a simplified and flexible approach for municipalities to undertake settlement area boundary changes at any time, with requirements for municipalities to consider additional criteria related to need for the expansion to accommodate growth, infrastructure capacity, phasing of growth, achievement of housing objectives, consideration of alternative locations to prime agricultural areas, and impacts on agricultural systems (updated)

Comments

More clarity is needed on how this would work. There should still be guidance on settlement expansions to ensure they are done responsibly.

- Permit municipalities to identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities needed to support development are planned or available (new)

Comments

The Town is of the opinion that this policy should include additional detail to ensure that the identification of a new settlement area should only be considered where growth cannot be accommodated adjacent to an existing settlement area.

- Require municipalities to plan for and protect employment areas based on a definition of employment areas that would align with the Planning Act definition of “area of employment” amended through Bill 97 but not yet proclaimed.

Comments

At a minimum, the PPS should explicitly allow for commercial uses (e.g., office, retail) in employment areas when they are located in the middle of an employment area, where other PPS policies do not permit sensitive land uses, or where they provide an important buffer function to nearby residential communities. The proposed PPS policies on employment areas and land use compatibility should be strengthened to ensure an appropriate separation and transition between heavier employment uses and sensitive land uses is achieved.

- Allow municipalities to consider employment area conversions at any time to support the forms of development and job creation that suit the local context, under the condition that sufficient employment land is available to accommodate employment growth (updated)

Comments

This should be initiated by the municipality to ensure that municipalities are not hit with many requests for conversions. More clarification is necessary regarding appeal rights and this could

become burdensome for municipalities. The Town suggests maintaining the requirement that conversion requests only be considered through an MCR.

Caledon is concerned about protection of existing employment areas for existing and future employment uses, the implementation of the Town's Economic Development Strategy, and the long-term implications of potentially short-sighted conversions. The proposed PPS already, more appropriately, requires planning authorities to permit and facilitate the redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for housing.

The Town supports the consideration of employment land conversions only as part of an official plan review, as that is when overall employment land demand/supply and land use compatibility is typically reviewed. It could be burdensome for the municipality to respond to ad-hoc employment conversion proposals (or retain peer reviews of employment supply/demand and land use compatibility analyses) outside of an official plan review.

Provide Infrastructure to support development

- Require municipalities to plan for water and wastewater infrastructure, and waste management systems, and require large and fast-growing municipalities, and encourage others, to undertake watershed planning (updated)

Comments

The Town supports the requirement for large and fast-growing municipalities to undertake watershed planning. We would appreciate clarification that subwatershed planning conducted on behalf of development-proponent landowners, in accordance with terms of reference established by the municipality and conservation authorities, would satisfy this policy requirement. We also suggest replacing "encourage others" with "encourage other municipalities" to improve clarity.

Balance housing with resources

- Require municipalities to protect water resources and features and require large and fast-growing municipalities (updated) and encourage others, to undertake watershed planning in collaboration with conservation authorities (updated)

Comments:

See comments above.