



October 7th, 2019.

**Ministry of Municipal Affairs and Housing
17th Floor - 777 Bay St.
Toronto, ON M5G 2E5**

Dear Honorable Minister Steve Clark

Re: Provincial Policy Statement Review – Proposed Policies

We respectfully submit the following comments for your review and consideration in the proposed changes to the Provincial Policy Statement.

Feedback

The policies generally support the goals for housing supply and creating jobs while protecting environment, farmland and public safety, however, some minor modifications could assist in the implementation and facilitation of approvals.

The difficulty in implementation arises in the interpretations and bias of various agencies, municipal departments and commenting groups. These groups like to expand their influence and departmental control with a narrow perspective and a single focus bias. The PPS suggests that the desired outcome is to promote responsible growth, however, the application or implementation of the policies needs to be clarified further to reduce the confusion surrounding certain interpretations. Staff, no matter what level, will default to the safest interpretation so not to offend the policy despite its impacts on growth or approvals. This strict adherence or bias of a certain view does not promote or balance the benefits of growth. The hierarchy should represent that growth is the desired outcome and that the policies need to support this in a framework that considers the various elements of the PPS within the growth and affordability context. Further dialogue on the implementation section would assist.

Policy Discussion

The PPS identifies that the policies represent minimum standards, however, the application of planning thresholds are being applied as absolutes and to not exceed. An example is the application of ‘Settlement Boundaries’ and the policies that seem to conflict with the flexibility statements on how the read the document.

For example, Policy 1.1.2 identifies that sufficient lands shall be made available to accommodate growth for up to 25 years. This is a limit that guides use but may not be practical as an upper threshold depending on the geographic nature associate with serviceable lands, roads and infrastructure. Additional flexibility should be given through the elimination of “up to” from the policy. There is no need to delay development and have landowners with legitimate serviceable development lands fighting for a finite settlement designation. Many municipalities have growth management tools that schedule major infrastructure and the PPS can identify this as a solution to this issue.

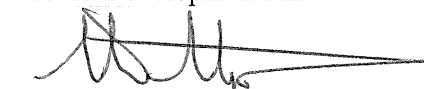
Additionally, we should not require that any expansion only occur through a comprehensive review. If there are merits for an expansion, they should be permitted. The current statement would suggest that the municipality's original delineation of the boundary included all the appropriate lands for growth but we all know that isn't always the case. In London there are numerous examples of lands on the wrong side of a boundary that are fully capable of being serviced and in fact have infrastructure including SWM ponds built but we can't develop them because of the strict view on growth boundary. That is not an efficient use of infrastructure and it's this policy that restricts flexibility. The PPS does enable an exception through Policy 1.1.3.9 which would permit an expansion through a substitution of lands that are in the growth boundary. The difficulty is how we treat both sides of this equation. How do we track this substitution? How do we bring the substituted lands back in...presumably once the lands are developed? Will there need to be an OPA? Can we just do it through a holding zone? Why do we need to identify lands that are beyond 20 years and bring in lands obvious to development-leaves room for conflict with the municipality and landowners which won't provide a solution for affordability? The PPS should stay true to being a development enabling statement, not a form of control open to abuse and full restrictions.

The Province's regions do impact the treatment of various policies. Southwestern Ontario is primarily classified as Prime Agricultural land. The prohibition of development of agricultural lands is problematic to any expansion and therefore further attention is required as it relates to this area. An absolute prohibition should not be articulated in the document. Consideration should be permitted and that a framework developed to conserve agricultural lands but not when there are no other feasible alternatives. Lot creation for some rural areas is a necessity to increase the tax base and the current (and previous) policy eliminates this tool despite having any tangible impact on the agricultural community. When a residential home exists, there is no additional impact on the operation of the farm. This should not only apply to farm consolidation but lands that are imminent for development when existing structures exist, and the utility of the existing homes remain. Severances should be considered and should not be prohibited.

With the prescribed objective of 'responsible growth', we should be able to reduce the uncontrolled expansion of special interest perspectives which unduly delay developments. The ability to be flexible on expansion of growth boundaries and not be slaves to a numeric exercise is necessary and will provide better long-term planning. Clear implementation tools are necessary to provide a framework to move forward.

We thank-you in advance for your consideration.

Yours truly,
Auburn Developments Inc.



Per, Stephen Stapleton,
Vice President