**October 21, 2019**

**Planning Consultation**

**Provincial Planning Policy Branch**

**777 Bay Street, 13th floor**

**Toronto, ON M5G 2E5**

**RE: Provincial Policy Statement Review – Proposed Policies (ERO # 019-0279)**

Please accept this letter in response to the Environmental Registry of Ontario – ERO #019-0279 Provincial Policy Statement Review, Proposed Policies. Town staff and Council have reviewed the draft policies contained in this document and are appreciative of the opportunity available to participate in this process. These comments are provided on behalf of and as directed by Town Council.

We feel that the issues, opportunities and challenges affecting a small town of 9,000 people that is experiencing a sudden and significant growth pressure is different than those affecting larger metropolitan areas and we look forward to provide comment through that lens.

Our comments are outlined under the key themes of the proposed amendments and modifications.

1. **Increasing Housing Supply and Mix**
* **Vision; Sec.1.4.1, Sec. 1.4.3, “Housing Options”** definition - We note that “market needs” are introduced as an evaluation consideration, however there is little in the way of guidance material or direction in relation to defining what this means in decision making. We suggest this be concept be clarified to ensure that a market lens is considered *association with other key planning matters* that must be considered in developing a complete community. Absent this, such a focus is likely to embolden development applications that replicate past development trends, rather than encouraging creative approaches to solve community building issues we are facing.
* **Sec. 1.1.3.8** – The Town welcomes policy changes that will increase the local decision-making abilities outside the realm of a comprehensive review, specifically in regard to boundary expansions.
* **Sec. 1.4.3** - While the Town generally supports policy changes that will increase the supply of all housing types for various socio-economic needs and encourage all types of mixed-use development, we must emphasize that policy alone cannot achieve this objective. To assist municipalities in this pursuing this objective, we recommend that the Province partner with us to explore incorporating tools such as conditional zoning, development charge rebates or tax incentives.
* **Sec. 1.4.3(b)(1)** – We note that the draft policy appears to open the door to accommodate long term care homes and similar forms of housing in a broader sense than is currently provided for in current municipal planning documents. We respectfully request that the policy be clarified to ensure that municipalities can effectively regulate denser development to ensure adequacy of servicing and local compatibility.
1. **Protecting the Environment and Public Safety**
* **Vision; Sec. 1.1.1(i), Sec. 1.6.1, Sec. 1.6.6, etc.** – We appreciate an increased emphasis on climate change adaptation and resiliency, particularly with respect to storm water systems. This will support efforts to embed climate resiliency efforts into development processes to better prepare for extreme events. That being said, some wording on climate mitigation has been softened, especially as it relates to renewable energy and waste management. It is in the Town’s long-term economic interest to focus on both mitigation and adaptation through effective land use planning policies and environmental strategies and recommend that the PPS continues to consider both aspects of this important subject
1. **Reducing Barriers and Costs**
* We note a number of changes in the draft PPS from “shall” to “should”, particularly relating to the promotion of compact and efficient development in designated growth areas. This is not a minor change in practice and the softening of this language may impede Council’s objectives in directing the pattern and density of development in the areas targeted for this.
* **Sec. 4.7** – While we welcome ways to ensure the efficient and smooth processing of applications, it is not clear to us how a “fast track” provision would be implemented, particularly in light of our existing legislative requirements and agency reviews that allow for Council to have all information needed to make an informed decision. Additionally, we respectfully note that many delays in development applications extend well beyond the realm of municipal responsibility and include technical reviews by other levels of government (ie. stormwater). While an efficient process should always be a municipal goal, a broader look at this theme is critical to achieve this objective.
* **Sec. 2.5.2.2** - With respect to mineral aggregate operations within natural heritage features, we respectfully suggest that a test of “no negative impacts” would be very difficult to meet and this should be clarified.
1. **Supporting Rural, Northern and Indigenous Communities**
* **Vision** - The Town appreciates and supports the emphasis on engaging Indigenous communities in the municipal planning process and would welcome further direction on how engagement should meaningfully occur. This has not often been communicated to local municipalities.
1. **Supporting Certainty and Economic Growth**
* **Sec. 1.2.6 -** The draft wording proposes to allow the development of sensitive land uses (ie. residential) adjacent to existing or planned industrial uses “where no alternative exists”. We recommend this be clarified to provide us direction on what an assessment of an alternative location would entail and how the Town would determine if this requirement has been met.
* **Sec. 1.3.1(c)** - Draft policy directing municipalities to facilitate conditions for economic investment by identifying strategic sites, monitoring the availability and suitability of lands and addressing potential barriers to investment reflect good practices that the Town already does and we support the inclusion of this aspirational section to provide guidance to municipalities.

Broadly speaking, the Town supports a number of proposed changes to the PPS that allow for greater flexibility in local decision making, however there are also some proposed concepts and language that can be problematic or require further clarification. That would be better allow us to assess the impacts on our own community. We are hopeful that a revised PPS would address these matters. We thank you for the opportunity to participate in this consultation and trust that the above feedback is helpful for the Ministry.

Please continue to advise the Town of Smiths Falls of any updates to this process, or whether we can be of further assistance.

Sincerely,



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Karl Grenke, MCIP, RPP

Senior Planner

cc. CAO M. Morris; Mayor S. Pankow