

October 10, 2019

Provincial Policy Statement Review
Ministry of Municipal Affairs and Housing
Provincial Policy Branch
777 Bay Street
Toronto, ON M5G 2E5

Dear Sir or Madam:

Re: ERO #019-0279 – Provincial Policy Statement

The Township of Springwater has had an opportunity to review the proposed revisions to the Provincial Policy Statement (PPS) released on July 21, 2019 and provide the following comments with regards to:

Increasing Housing Supply and Mix

Township Staff Comments:

Provision to increase the planning horizon timeframes are more in-line with infrastructure planning and are generally supported by staff. However, Provincial documents such as the Growth Plan should be considered more closely to determine whether population allocation policies create an impediment to plan for increased time horizons.

Employment

Township Staff Comments:

An increased time horizon for employment land supply (from 20 to 25 years) provides municipalities with the ability to plan for additional employment land to increase opportunity for the establishment of employment uses.

Additional flexibility to allow for the conversion of employment lands to residential uses is of concern as pressure to convert employment lands to residential uses is anticipated. Pressures to convert employment lands could affect the Township's employment land supply which may impact the Township's ability to meet employment targets.

Servicing

Township Staff Comments:

Proposed PPS revisions identify a preference for private communal systems for water and sanitary services for multi-unit/lot where municipal services (water and sanitary) are not available.

The proposed revision creates concerns from a municipal operations and financial perspective as failed systems have the potential to become a municipal responsibility, which would ultimately represent a financial burden if private corporations were to discontinue on the specific land holding.

Supporting Rural and Northern Indigenous Communities

Township Staff Comments:

Proposed revisions encourage enhanced dialogue and consultation with Indigenous Communities, which is supported by staff.

Definition Additions and Revisions

Township Staff Comments:

Agricultural System – Represents a definition that was added to the PPS to mirror and reflect the definitions with the newly Growth Plan (2019) for consistency.

On-farm Diversified – Revised to include “Ground-mounted solar facilities” as permitted uses within prime agricultural areas and specialty crop areas only as “on-farm diversified use”.

Definition is vague and allows for solar facilities in conjunction with an agricultural use, but does not specify the scale or scope that such uses can entail. Staff is concerned that this revision will result in the removal of productive agricultural land as there are not any parameters in place to establish an appropriate scale for solar facilities.

Agri-food Network – Definition was added for consistency to reflect definition within the updated Growth Plan.

Housing Options – Definition proposed to provide direction with respect to housing options to encourage a range of housing types, which is consistent with the Provincial mandate to increase housing supply.

Impacts on Changing Climate – A definition proposed to reflect changing climate and the need to plan for infrastructure to mitigate negative impacts associated with weather pattern changes is warranted.

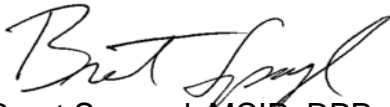
Residential Intensification – A revision to the definition is proposed to include reference to new housing development options and additional residential units, which is in-line with the Provinces mandate to increase housing supply.

TOWNSHIP OF SPRINGWATER COUNCIL COMMENTS

Council for the Township of Springwater directed staff to include the following for consideration with respect to policies regarding settlement area boundary expansions.

Council requested that consideration be given towards providing policy direction to focus land need assessment analysis on a Settlement Area by Settlement Area basis (Settlement Specific) rather than on a Township-wide basis to justify the need for expansion of a specific settlement area.

Sincerely,

A handwritten signature in black ink, appearing to read "Brent Spagnol". The signature is fluid and cursive, with the first name being the most prominent.

Brent Spagnol, MCIP, RPP
Director of Planning Services