

December 23, 2022

**SENT VIA EMAIL ONLY**

Ministry of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, Ontario  
M7A 2J3

**Re: ERO # 019-6177- Consolidation of the Provincial Policy Statement & Growth Plan Review**

The Township of Springwater have had the opportunity to consider consultation materials submitted for review from the Province regarding Bill 23 and more specifically consolidation of the Provincial Policy Statement (PPS) and A Place to Grow: Growth Management Strategy for the Greater Gold Horseshoe.

Provided with this letter is a staff report dated December 21, 2022, which provides comments which were received by Council through Resolution C508-2022.

The following table contains a summary of Township comments in response to the Province's focused questions and consultation.

<b>BILL 23 – ERO # 019-6177</b>	
<b>Theme/Question for Consideration</b>	<b>STAFF COMMENTS</b>
<b>Residential Land Supply</b>	<p><b><i>Settlement Area Boundary Expansions</i></b>-The Growth Plan currently establishes criteria to be considered with respect to settlement area boundary expansions with the intention to only expand boundaries when the need for additional land can be demonstrated. This approach has generally been taken to avoid unnecessary sprawl and preserve farmland.</p> <p>Therefore, staff suggests that current policies within the Growth Plan provide the necessary considerations to determine land need prior to settlement area expansions.</p> <p><b><i>Rural Housing</i></b>-A fundamental premise behind directing growth to settlement areas is to reduce the potential for</p>

	<p>incompatible land uses within rural areas, primarily in close proximity to agricultural uses.</p> <p>While the prospect of providing flexibility to develop in rural areas may free up additional land and provide additional opportunity for housing, land use compatibility needs to be a paramount consideration to ensure that the agricultural land base and industry is not negatively impacted.</p> <p><b>Employment Area Conversions</b>-It is recommended that conversion of employment land to residential lands be discouraged as the preservation of an employment land base is needed to provide opportunity to work and live in communities, which is a fundamental objective to create complete communities.</p>
<p><b>Attainable Housing Supply Mix</b></p>	<p><b>Housing Mix</b>-Providing greater certainty to provide for appropriate range in housing mix/options is supported. The determination of what is considered to be affordable should be reviewed through further consultation involving affordable housing experts.</p> <p><b>Major Transit Station Areas</b>- (Not applicable to the Township of Springwater)</p> <p><b>Urban Growth Centres</b>-Policy direction to define existing or downtown cores is currently found within the Growth Plan. Springwater has utilized this policy to identify downtown areas and direct intensification to those areas. The lack of infrastructure (municipal water, sanitary and roads) is an impediment to developing downtown areas in Springwater.</p>
<p><b>Growth Management</b></p>	<p><b>Population and Employment Forecasts</b>-Springwater is currently utilizing information from a Growth Management Strategy completed as part of its' Official Plan Update/Review. Staff suggest that sufficient direction currently exists to allow for the review of local information relevant to population and growth forecasts.</p>

	<p><b>Intensification</b>-Staff is of the opinion that sufficient policy direction exists within the Growth Plan as it relates to intensification and the need to intensify in strategic areas.</p> <p><b>Large and Fast-growing Municipalities</b>- (Not applicable to the Township of Springwater)</p>
<p><b>Environmental and Natural Resources</b></p>	<p><b>Agriculture</b>-Staff recommend that substantive residential development in agricultural areas be discouraged to avoid the reduction of the agricultural land base and the introduction of incompatible land uses that could have a negative impact on farming operations.</p> <p><b>Natural Heritage</b>- The protection of Natural Heritage features should be the primary focus of land use policy direction.</p> <p><b>Natural and Human-made hazards</b> - A streamlined approach is supported by staff. However, a better understanding of what a streamlined approach entails along with the methodology used to determine risk are required to provide a fulsome response.</p> <p><b>Aggregates</b> - Staff suggest that existing Provincial policies ensure that aggregate resources can be provided close to market.</p> <p><b>Cultural heritage</b> – Staff cannot comment regarding this initiative as draft policy is not available to review.</p>
<p><b>Community Infrastructure</b></p>	<p><b>Infrastructure Supply and Capacity</b>- Staff are of the opinion that existing PPS and Growth Plan policies encourage long-range integrated infrastructure planning.</p> <p><b>School Capacity</b> - Staff are of the opinion that existing PPS and Growth Plan policies require the provision of schools through on-going collaboration with school boards.</p>
<p><b>Streamlined Planning Framework</b></p>	<p>While a streamlined planning approach may be helpful in providing for an increase in housing supply, the details and impact of a streamlined process can only be</p>

	assessed once draft policies are available. Planning staff are of the opinion that commenting on a streamlined approach is premature until such time as draft policies are available for review.
What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?	The preparation of one Provincial Policy document is preferable, however recognizing geographic differences may be a challenge.
What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?	Re-consider the use of Provincial population allocations/limits and provide municipalities with the tools to plan for local growth considerations based on local Growth Management Strategies. Strengthen policies requiring a greater mix of housing within urban areas. Potentially minimum thresholds per housing type.
How should the government further streamline land use planning policy to increase the supply of housing?	Review additional approval frameworks where overlap of approvals can be removed (Servicing).  Potential for various forms (partial, private, full municipal water & wastewater) of servicing to support housing.
What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?	Additional Residential Unit and intensification policies are helpful for ensuring a sufficient supply and mix of housing. This is subject to the availability of municipal services and infrastructure (water and wastewater) needed for support.
What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?	Natural Heritage mapping/policies should be prepared at the local level based on local knowledge.

Respectfully,



Brent Spagnol  
Director of Planning Services

Cc: Mayor Coughlin, Township of Springwater  
Jeff Schmidt, CAO, Township of Springwater