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December 30, 2022

Honourable Steve Clark  
Provincial Land Use Plans Branch  
13th Flr, 777 Bay St  
Toronto, ON  
M7A 2J3  
Canada

**RE: Review of A Place to Grow and Provincial Policy Statement**

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Dear Minister Clark,

Please find enclosed Sifton Properties Limited's (herein known as "**Sifton**") review and comment regarding proposed changes to the Provincial Policy Statement, 2020 and A Place to Grow, 2019. We are, generally, in support of the proposed changes to A Place to Grow and Provincial Policy Statement as enclosed in the attached.

We appreciate the opportunity to comment on the proposed changes to the Conservation Authorities Act. Should you require anything further, please don't hesitate to contact our office.

Yours truly,

**SIFTON PROPERTIES LIMITED**

Lindsay Clark, BES  
Manager – Planning & Development  
Neighbourhood Developments

Cc: Phil Masschelein, Senior VP Neighbourhood Development

## **Review of A Place to Grow and Provincial Policy Statement**

### ***Proposal***

*The government is proposing to integrate the PPS and A Place to Grow into a new province-wide planning policy instrument that:*

- *Leverages the housing-supportive policies of both policy documents;*
- *Removes or streamlines policies that result in duplication, delays or burden in the development of housing;*
- *Ensures key growth management and planning tools are available where needed across the province to increase housing supply and support a range and mix of housing options;*
- *Continues to protect the environment, cultural heritage and public health and safety; and*
- *Ensures that growth is supported with the appropriate amount and type of community infrastructure.*

*The intended outcome of this review is to determine the best approach that would enable municipalities to accelerate the development of housing and increase housing supply (including rural housing), through a more streamlined, province-wide land use planning policy framework.*

**Sifton is in support of the proposed integration of the PPS and A Place to Grow province wide document, as long as the policy structure is inclusive of all urban areas including municipalities outside of the GGHA to ensure consistency of housing supportive policy documents.**

*The core elements of this new policy instrument could include the approaches outlined below:*

### ***Residential Land Supply***

1. ***Settlement Area Boundary Expansions*** – *streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth*

2. **Rural Housing** – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas
3. **Employment Area Conversions** – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate

Sifton is supportive of Settlement Area Boundary Expansion, Rural Housing, Employment Area Conversions as options to provide additional residential land supply. Currently, the majority of municipalities are not taking an active role in their requirement to provide residential lands. The current policies only allow expansion and employment conversion during a Municipal Comprehensive Review, as per the PPS. Sifton believes in order to provide the housing that is required in Ontario, both expansion and employment conversion should be permitted through a standard process OPA/ZBA. If expansion and conversion are still part of the MCR, development could be delayed up to ten years.

#### ***Attainable Housing Supply and Mix***

1. **Housing Mix** – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs
2. **Major Transit Station Areas** – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario
3. **Urban Growth Centres** – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur

Sifton is in support of the proposed Housing Mix, MTSA's and Urban Growth Centres. Sifton would like to request further clarity on Housing Mix policies that municipalities are required to follow, as Sifton has received pushback regarding certain housing options and densities are not permitted based on local policies. Additionally, Sifton would request that inclusionary zoning be permitted outside of MTSA's. Sifton would request density targets be applied to all

municipalities, as the smaller municipalities do not believe they are required to provide housing and are delaying approval of residential land supply.

### ***Growth Management***

1. ***Population and Employment Forecasts*** – policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment
2. ***Intensification*** – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas
3. ***Large and Fast-growing Municipalities*** – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit

Sifton is in support of the most current population and employment forecasts to provide the appropriate land for residential and employment needs, as most municipalities utilize outdated information to determine their land assessment. Sifton believes that intensification should include areas in both urban and suburban and not only in transit corridors. Sifton has already experienced municipalities restricting infrastructure growth due to Bill 23 reduction of Development Charge fees. Allocation of provincial investments or other programs for infrastructure should be established as this will indefinitely slow development to pre-Bill 23 state.

### ***Environment and Natural Resources***

1. ***Agriculture*** – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations
2. ***Natural Heritage*** – streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting/compensation (**Proposed Updates to the Ontario Wetland Evaluation System**)

3. **Natural and human-made hazards** - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk
4. **Aggregates** – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed
5. **Cultural heritage** –policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply (**Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 (Schedule 6) - the Proposed More Homes Built Faster Act, 2022**)

Sifton is in support of the above changes through Bill 23. Currently many municipalities include all lands outside of the urban growth boundary as prime agriculture lands which does not permit expansion of the boundary. These lands are not prime agricultural and are rural lands that could provide additional residential housing.

#### **Community Infrastructure**

1. **Infrastructure Supply and Capacity** – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning
2. **School Capacity** – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education’s proposal to support the development of an urban schools’ framework for rapidly growing areas

Sifton is in support of the proposed changes, however municipalities are resistant to the infrastructure planning due to the changes to Bill 23 – Development Charges. Projects originally scheduled for 2024 are now being pushed out 5-10 years due to financial restrictions.

#### **Streamlined Planning Framework**

1. **Outcomes-Focused** – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes
2. **Relevance** – streamlined policy direction that focuses on the above-noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests

3. ***Speed and Flexibility*** – policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier

**Sifton is highly supportive of the streamlined approach to planning and the removal of duplication of policies and process between the province and municipality and between two tier municipalities.**

**Questions:**

1. *What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?*
2. *What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?*
3. *How should the government further streamline land use planning policy to increase the supply of housing?*
4. *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?*
5. *What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?*

**Sifton's Responses:**

1. **Sifton is in support of the province-wide land use planning instrument with the ability to ensure very specific policies are laid out to municipalities to ensure they have the appropriate clarity to carry out the requirements as per the proposed changes.**
2. **Provide minimum targets for the entire province including smaller municipalities to ensure they are providing housing in the rural and suburban areas. Remove the ability for municipalities to choose where and what kind of housing is permitted, remove density maximums.**
3. **Municipalities are trying to control the changes made by Bill 23 including housing, this is not acceptable and the province needs to provide better accountability and allow for developers to contact the ministry, if the municipalities are not following the requirements. Another reporting mechanism outside of the OLT.**
4. **Density targets are helpful but we also need to remove maximum density targets in current Official Plans and provide targets per year not just by 2031.**

5. **Policy that contradicts providing housing, limitations or restrictions or policies that would prohibit the ability to provide adequate residential lands supply.**