December 27, 2022

**EBR posting 019-6177**

**Changes to A Place to Grow and Provincial Policy Statement**

As a rural housing developer with 50 years experience, I am offering input to EBR posting 019-6177 on changes to A Place to Grow and Provincial Policy Statement. I am pleased to see Ontario taking steps to support rural housing and rural settlement policies.

The following are answers to questions posed in EBR 019-6177 in light of our experience as a developer and builder of rural housing.

**Thoughts on proposed core elements needed in a streamlined land use planning policy instrument?**

With regard to rural development, the Growth Plan and the PPS should be strongly supportive of housing opportunities on secondary agricultural lands. The Province should prevent municipal official plans being more restrictive on rural settlements and rural development than Provincial Policy.

**What land use policies should Ontario use to increase housing supply and diversity of types?**

We support preserving quality prime agricultural lands, however the secondary agricultural lands should clearly allow rounding out and infilling in small settlement areas. As farming consolidates with larger farms on primary agricultural lands, there are a diminishing number of persons living on those lands in rural Townships. Establishing housing on secondary agricultural lands will assist in ensuring that the rural Townships remain vibrant and economically strong.

Rural housing development like we propose adds to the housing supply much needed in the market. It meets a specific high end market need and allows the market to be more balanced.

**Ideas for streamlining to increase housing supply?**

Eliminate or place rules on mandatory pre-consultation.

Make the current Municipal Comprehensive Review process the last one Province wide, and mandate that the final official plan amendment resulting from this process outline how the approval authority will streamline its approval process.

**What policies in A Place to Grow and Provincial Policy Statement increase housing supply and diversity of types?**

Allow growth projections from the current Municipal Comprehensive Review, and any done voluntarily in the future, to be flexible between one settlement area in a local municipality to another settlement area. If one local municipality in a County or Region is not pro-growth then allow other municipalities in the same County to pick up the slack. Do not unnecessarily restrict municipalities open for growth to numbers a low growth municipality will not meet.

**What policy concepts aren’t needed in A Place to Grow and Provincial Policy Statement?**

The Province should change the requirement that developments “be consistent with Provincial Policy” back to “have regard to” Provincial Policy as was previously the case. This gives more local decision making authority and recognizes that municipal Councils are mature and independent decision making bodies.

Generally, developers do not have issues with development charges that are reasonably laid out and consistent in metrics. What drives costs are unknowns such as lagging decision making and approval times.

Thank you for the opportunity to comment.

Respectfully submitted

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