



May 16, 2023

Environmental Registry of Ontario

Re: ERO Number: #019-6813

To whom it may concern:

At the Regular Council Meeting of May 15, 2023, the Township of Cavan Monaghan Council received a Report regarding Bill 97, Helping Homebuyers, Protecting Tenants Act, 2022. Council discussed this matter and passed the following motion:

That Council receive Report Planning 2023-24 Bill 97 – Helping Homebuyers, Protecting Tenants Act, 2023) for information;

That Council direct Staff to provide correspondence (a letter to the ERO) outlining Council's concerns with respect to Bill 97; and

That a letter outlining Council's comments be submitted to the Environmental Registry of Ontario (ERO) as the Township's written submission regarding Bill 97 prior to the commenting deadline of June 5, 2023

Consistent with the motion, Staff are providing the following comments on behalf of Township Council and submitting to the Environmental Registry of Ontario (ERO):

- The Township supports the removal of mandatory intensification and density targets as they have proven to guide but also be a barrier to consistent growth and land-use planning policy as illustrated through the most recent County of Peterborough MCR;
- The Township supports the ability to provide residential intensification through the conversion of commercial and institutional buildings for residential uses;
- The Township supports the expansion of the definition of housing options to provide a range of housing arrangements and forms;
- The Township does not support the elimination of the definition of "affordable" as this term is used in its current Official Plan and the use of inclusionary zoning (which is not in the OP) may not provide the much needed housing options at the local level;
- The Township is concerned that multi-residential development on rural lands may result in the loss of agricultural land and land use compatibility through lot creation and permission of up to two additional residential units per rural lot;
- The Township supports the flexibility to expand the settlement area boundary outside of an MCR but is concerned of the possible implications of removing a "needs test" and criteria as part of that expansion as this may create undue pressure on existing settlement areas and encourage the creation of possible new serviced settlement areas in the Township including the impacts of expansion on agriculture;

- The Township supports the promotion of mixed-use development while promoting the protection and conversion of employment areas;
- The Township supports the explicit collaboration of school boards and planning authorities to ensure schools are planned as part of development;
- The Township is concerned about removing the requirement that a proponent demonstrate need or look at alternatives when siting sensitive land uses to avoid adverse effects;
- The Township supports strengthening the list of prohibited uses in employment areas;
- The Township does not support the significant weakening of the Natural Heritage System established through the Growth Plan;
- The Township is concerned that in the absence of specific natural heritage policies and regulations, the PPS only focused on balancing natural resource use and management with housing supply and there has been the removal of reference to conserving biodiversity and protecting ecological processes;
- The Township is concerned about the possible threat to prime agricultural land lost through settlement area expansions that do not fully consider alternative locations of expansion outside of a comprehensive review which may lead to the loss of prime agricultural land;
- The Township supports the elimination of requiring the use of the provincially mapped Agricultural System;
- The Township does not support permitting up to two additional residential units in addition to the principal dwelling in an agricultural operation in prime agricultural area or the creation of up to three residential lots from an existing agricultural parcel;
- The Township does not support the expanded Ministerial authority to make orders that provincial policy, plans and official plans do not apply with respect to a license, permit, approval or permission;
- The Township does not support restricting its ability to enact more restrictive policies than the PPS 2023 as local autonomy is important;
- The Township supports the inclusion of MZOs as additional projected growth to be included in the municipality's next official plan update;
- The Township does not support the implementation provision that decisions must be consistent with the PPS 2023 before such time as its Official Plan and Zoning By-law have been updated; and
- The Township supports the Province's goal of increasing the housing supply in Ontario, these fundamental changes to legislation being implemented without sufficient lead time for analysis or commenting create tremendous challenges and inefficiency for municipalities.

Sincerely,

[ORIGINAL SIGNED BY]

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