



SMITHS FALLS

RISE AT THE FALLS

June 9, 2023

Planning Consultation
Provincial Planning Policy Branch
777 Bay Street, 13th floor
Toronto, ON M5G 2E5

RE: Provincial Policy Statement 2023 – Proposed Policies (ERO #019-6813)

Please accept this letter in response to the Environmental Registry of Ontario – ERO #019-6813 pertaining to the proposed policies of the new Provincial Policy Statement. Town staff and Council have reviewed the draft policies contained in this document and are appreciative of the opportunity available to participate in this process. These comments are provided on behalf of and as directed by Town Council.

The issues, opportunities and challenges affecting a small town of 9,200 people that is experiencing a sudden and significant growth pressure is different than those affecting larger metropolitan areas and we look forward to provide comment through that lens.

Our comments are outlined under key themes in the PPS for ease of reference.

Settlement Areas and Settlement Area Boundary Expansions (Sec. 2.3)

- *Sec. 2.3(4) – The Town welcomes policy changes that will increase local decision-making abilities in regards to boundary expansions, however we strongly recommend that clearer direction be provided for certainty to municipalities and developers, as outlined below:*
 - *Re-establish language calling for boundary extensions to be logical and sequential, thereby avoiding leapfrog development;*
 - *Consider financial viability over the life cycle of infrastructure and public service facilities;*
 - *Consider how to accommodate the development while protecting other provincial interests.*
- *Proposed changes make it difficult to plan for infrastructure without detailed population and employment projections identify growth needs. Direction should be given as to how this can or should be done. A lack of direction can lead to unpredictable outcomes in the event of an appeal.*

Housing (Sec. 2.2)

- *Sec. 2.2.1(b)(2) - the Town is generally supportive of proposed changes that support residential intensification, however this section should allow*



SMITHS FALLS

RISE AT THE FALLS

municipal autonomy to enforce areas of specific local interest, such as preserving certain existing commercial spaces (such as ground floor commercial development downtown) and limiting or phasing intensification in areas where costly infrastructure upgrades would be required.

- *We do not understand the removal of subsection (f) that established the requirement to establish development standards for intensification “which minimize the cost of housing and facilitate built form, while maintaining appropriate levels of public health and safety.” A “complete community”, as per the proposed definition is not achievable in any meaningful or long-term sense without the consideration of development standards addressing the broader public interest.*
- *The Town appreciates the implied flexibility through the amended “housing options” definition; however strongly suggest that a housing section reference a need for municipalities to consider affordability in policy as part of a “complete community”.*

Employment

- *Sec. 2.8.2(2) – The Town is generally supportive of scoping the permitted uses in employment lands to focus on their core function, however support revising this section and the corresponding definition to allow the flexibility to include certain stand-alone uses such as offices that support the core uses identified in the PPS. This would allow some latitude for our business park to evolve to meet the needs of employers.*
- *Sec. 3.5.2 – The Town supports the need for employment areas to be protected for their long-term use and encourages policy to emphasize that such lands are economic resources that need to be protected similar to other protected categories. Our concern is that the softening of language relating to incompatible encroaching uses can have long term impacts on either the sensitive use or the employment area or major facility, thereby creating a conflict that should be avoided unless absolutely impossible otherwise.*

Natural Heritage (Sec. 4.1)

- *Good planning practice requires an assessment of all PPS policies in their totality and their relationship to each other in order to inform a complete and thorough decision that considers all elements of public interest. Natural heritage features form a part of this and should be considered in conjunction with all other parts of the PPS. The new PPS should include the Province’s policy direction regarding natural heritage features and it is impossible to meaningfully and comprehensively review this important document with that*



SMITHS FALLS

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key section missing. In our opinion, approval of the PPS is premature without those policies in place for consideration.

- *In drafting the new Natural Heritage policies, the Town encourages the Province to also consider natural heritage features and systems as infrastructure that supports a complete community. Viable and functional natural heritage systems can exist with a minimal degree of human intervention, however manage stormwater, enable recreation and improve public health. Unlike most infrastructure built by humans, natural heritage systems do not depreciate in value over time.*

Climate Change (Sec. 2.9)

- *The Town recommends that policies and tools supporting climate resilience and adaptation be woven throughout the PPS, to highlight the role the province and municipalities can play. We recommend a greater emphasis on compact development, appropriate location of travel-intensive uses, waste management and green development standards and techniques to assist municipalities in achieving their own reduction goals. We note that other proposed policies, including those further enabling scattered low-density housing in suburban and rural areas appears contrary to climate objectives.*

Broadly speaking, the Town supports a number of proposed changes to the PPS that allow for greater flexibility in local decision making, however there are also some proposed concepts and language that can be problematic or lead to unintended consequences in community development. While many of these changes do not prevent us from exceeding the standards and targets set out in the PPS, the corollary is that it may be harder to say no to, and defend that decision, where a development is financially unsustainable for the municipality or otherwise not in the interest of the community. We thank you for the opportunity to participate in this consultation and trust that the above feedback is helpful for the Ministry.

Please continue to advise the Town of Smiths Falls of any updates to this process, or whether we can be of further assistance.

Sincerely,

Karl Grenke, MCIP, RPP
Senior Planner

cc. CAO M. Morris; Mayor S. Pankow