**Comments on the Proposed Provincial Planning Statement, 2023**

**Introduction**

The proposed Provincial Planning Statement (“Statement”) would revoke A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement, 2020 (“PPS”). The Statement is similar in structure to the current PPS, with minor modifications. Below are CLV Group Development’s comments regarding the proposed changes.

**Growth and Density Targets**

The Statement proposes that municipalities will no longer be required to plan specific population and employment targets. However, the omission of the Growth Plan’s policies on growth targets could bring several challenges as municipalities require guidance and parameters on setting density targets. The Statement states that density targets are “encouraged” under Policy 2.3.5, however, lack of stricter policies, including minimum targets, could lead to insufficient densities being established. In addition, lack of adequate policies for boundary expansion could subsequently lead to urban sprawl. On the contrary, promoting redevelopment, infill development, and densification could foster more sustainable growth. Municipalities should be required to incorporate these targets in their official plans and apply them across the entire municipality.

The proposed policies for complete communities, which lacks mandated intensification targets or redevelopment requirements, could have unintended consequences that would not be in line with intent of those policies if left to municipalities to implement. Municipal decision markers are elected officials, and often side with their constituents rather than what may be best for the future of the municipalities (NIMBYs). Additionally, the ability to expand settlement areas could lead to low-density development in newly expanded areas rather than encouraging infill projects.

**Housing Provisions**

The Statement would also benefit from further clarification on municipal obligations concerning affordable housing. The involvement of other levels of government regarding affordable housing provision is essential to meet current and future targets. Developers cannot be expected to bear the full weight of a societal issue such as affordable housing, as it is not sustainable. Government support is needed by way of offsets (funding, parking rate relief, development charge and parkland fees waived, etc.) and other invested stakeholders, such as banks could also play a role by way of reduced interests rates for land loans, construction loans, and for first-time buyers.

In addition, the proposed Statement aims to permit and facilitate conversion of existing commercial and institutional buildings for residential use within previously developed areas. This is seen favorably as it would contribute to an increase in the number of residential units. The Statement also proposes to require municipalities to provide a range and mix of housing options and an expanded definition to include multi-unit types. Further clarity is required as there is no definition of multi-unit types and what this would entail.

**Land Availability**

We support opportunities to create new residential areas and welcome the requirement for municipalities to plan for a minimum 25-year period. We also encourage the requirement to maintain a 15-year supply of residential land and ensure that municipal servicing capacity can accommodate new residential development for a 3-year period.

Growth planning should be integrated with utility providers to ensure adequate servicing for future growth. Additionally, we support the use of alternative servicing solutions to facilitate development in areas where conventional full municipal servicing options are not feasible.

**Rural Development**

The Statement proposes greater permissions for rural development that would allow for an increase in the supply of housing. However, this poses concerns with lot creation in prime agricultural areas. This is demonstrated in a less rigorous process for identifying new settlement areas and for settlement area boundary expansion, which will not require proof that there are no reasonable alternatives to avoid development in prime agricultural areas. Concerns regarding sprawl and the municipalities’ ability to control it also arise. As such, this policy should be revised to ensure the possibility of providing more housing supply with no negative effects for agricultural land. Agricultural land is incredibly important sustaining food supply for an increasing population.

Municipalities should consider designating lands adjacent to residential areas and settlement boundaries as rural to minimize conflicts and provide appropriate transition to secure prime agricultural land.

**Employment Areas**

The proposed Statement would encourage industrial, manufacturing and small warehousing uses without adverse effects to be located outside of employment areas adjacent to sensitive land uses in strategic growth areas and other mixed-use areas where frequent transit service is available. This could provide job opportunities for people living in the area provided that there are no adverse effects to the community. This policy would contribute to the creation of mixed used areas with a healthy balance of employment and housing.

**Natural Heritage**

Changes to natural heritage policies are required to introduce flexibility, leading to faster and positive outcomes. Such changes could include switching from the no negative impact test to a no net negative impact test for natural heritage features and adopting an offsetting approach for the removal of degraded natural heritage areas with limited functions. Finally, the definitions of ecological function, natural heritage system and negative impacts should be revised and updated.

**Conclusion**

We thank the Minister for the opportunity to provide comments on the Proposed Provincial Planning Statement. We are committed to building better communities and helping the province achieve its housing goals. We look forward to continuing to engage with the Ministry and providing valuable feedback to build a better Ontario.