



July 14, 2023

Hon. Steve Clark
Minister of Municipal Affairs and Housing
MPP, Leeds-Grenville-Thousand Islands & Rideau Lakes
Ministry of Municipal Affairs and Housing
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Re: Review of Proposed Policies Adapted from a Place to Grow and Provincial Policy Statement to Form a New Provincial Planning Policy Instrument (ERO number: 019-6813; comment period ends August 4, 2023)

Dear Minister Clark and Ministry Staff:

In taking the opportunity to respond to the proposed new Provincial Policy Statement (released for consultation on April 6, 2023, the Rural Ontario Municipal Association (ROMA) would like to begin by commending you and your Ministry for your thoughtful review of our December 22, 2022 submission and embedding the spirit behind many of our recommendations in the draft now in the last few weeks of the review period. We have included a chart summarizing the major issues raised in our original submission, echoing sentiments expressed in the original [Opportunities for Rural Ontario in a Post-COVID World](#), as well as our [Attainable Housing Task Force report](#). For your ease of access, we have summarized them further in this cover note.

While there are a handful of remaining concerns, there are many more areas where the Province's policy work will pay great dividends in rural Ontario and across the Province as a whole. As you know, we regard these two considerations as inseparable and are delighted to see the degree to which you have taken this perspective to heart. Let's begin there....

✓ **Recognition of the diversity of Ontario's communities and the importance of providing local flexibility** in how municipalities and other stakeholders make decisions and achieve their potential within the bounds of provincial priorities and shared goals.

ROMA underscored the importance of this issue on the very first page of its Opportunities paper and we believe this sentiment should be the foundation of provincial policy-making going forward:

“An Inclusive Model of Innovation and Resilience: None of these developments will be leveraged effectively as long as provincial and federal governments view the province’s landscape in a way that is increasingly outdated and ineffective. The prevailing use of a “hub and spoke” model, with an urban area as the hub and nearby towns, villages, hamlets and rural areas as spokes, suggests that the spokes are only germane to strategic decisions to the degree that they support the urban centre rather than the province as a whole. In this paper, Opportunities for Rural Ontario in a Post-COVID World, ROMA advocates for an alternative model --- the “network” model ---- that sees the interconnections of all communities --- whether rural or urban --- as a source of innovative service delivery options (proactively accessing on-the-ground experience of municipal governments and community agencies) and as a wellspring of resilience (by deliberate integration of domestic supply chains) and cross-community collaborations.” [Underlining added]

From the Opportunity report, the diversity of rural communities is noted as part of section 8. Growth on Our Own Terms, and in Appendix B where the “economic and social diversity of nonmetro areas is noted as part of the challenge of defining “Rural Ontario”.

This theme is reflected in multiple places in the draft *Provincial Policy Statement*, including:

- Preamble – Geographic Scale of Policies: “While this Policy Statement is to be read as a whole, not all policies will be applicable to every site, feature or area. This Policy Statement applies at a range of geographic scales.” [Underlining added]
- Preamble – Vision: “Ontario is a vast province with a diversity of urban, rural and northern communities, that is distinguished by different populations, economic activity, pace of growth and physical and natural conditions.”
- Chapter 2 2.3: Settlement area boundary expansions and pursuit of opportunities for new settlement areas where that makes sense.

✓ **Introducing two new concepts into land use planning (complete communities and strategic growth areas).** These two concepts, defined for greater clarity, make provincial expectations clear and link discussions and decisions about land use planning to the broader health, growth and well-being of our communities. In earlier reports, ROMA expressed its support for this line of thinking in two ways:

1. In the Opportunities Paper: Appendix D: Factors Affecting Community Well-being, and
2. In the ROMA’s December 2022, submission on the Provincial Policy Statement, where ROMA asked the Province to allow for the possibility of growth centres in both urban and rural areas:

Recommendation 4.1.ROMA notes that “urban growth centres” are not currently included in the Provincial Policy Statement’s definition of “area of settlement (see section 3.1 of this submission). However, ROMA would have no objection to the use of

the term “growth centre” as an example of a settlement area. It is assumed that a municipal council would be required to designate an area of settlement as a growth centre and that such a designation would be one of a number of terms that would be acceptable for settlement area boundary expansion. This approach would keep open the possibility of growth centres in settlement areas in Rural Ontario.

Recommendation 13.2: ROMA requests careful consideration of the definition of fast-growing municipalities and broadening the scope of major provincial infrastructure investments to including highways and roads, and “passenger transportation” generally, not just “transit.”

ROMA notes the following references in the draft *Provincial Policy Statement* and see them as the Ministry’s sincere and substantial effort to respond to our recommendations:

Complete Communities:

- Clarity regarding achievement of “complete communities” (Chapter 2 2.1)
- A much clearer definition of housing options and the financial tools with which they might be brought to market (Chapter 2 2.2)
- Inclusion of a wide range of uses in complete communities, including but not limited to public service facilities (Definitions)
- Direct reference to Service Managers to address the full range of housing options including housing affordability needs (Chapter 2.2 1)

ROMA sees this newly-embedded concept as being integral to the work we are now doing on ways to Improve Access to Services, one of the five themes set out in the [Opportunities for Rural Ontario in a Post-COVID World](#) paper. As the Ministry clearly appreciates, housing and access to services are deeply connected. A new *Provincial Policy Statement* will make that connection abundantly clear.

Strategic Growth Areas:

- Acknowledgement that there are --- and will continue to be --- areas outside of fast-growing, large cities that are already experiencing growth, and that municipalities should take a strategic approach to accommodating or encouraging this growth. The definition of “strategic growth areas” and the delineation of how municipalities should utilize these areas to achieve shared goals (Chapter 2.4).
- Definition of ‘strategic growth areas’ (Definitions) to mean “settlement areas, nodes, corridors and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.” [underlining added]
- ROMA notes that the strategic growth area concept is explicitly linked to prioritization for infrastructure investments as well as to public service facilities (Chapter 3 3.1). Indeed, public service facilities are mentioned 29 times in the draft Statement. From

ROMA’s perspective, these services are key to our local efforts to improve services “closer to home” and achieve complete communities.

- ✓ **Clarity regarding the definition of settlement areas.** The Ministry has clarified settlement area definitions for both urban areas and rural areas, based on criteria consistent with land use planning (concentration of development, mix of land uses, and designation in an official plan for development over the long term.) (see Definitions).

In ROMA’s August 2022 Attainable Housing Task Force report, we recommended exactly this sort of clarity:

ROMA Recommendations 3. A and B

A. Amend the definition of “area of settlement” in the Planning Act – Interpretation to read: “area of settlement” means an area of land designated in an official plan for (delete urban) higher density and a broader mix of uses, including towns, villages, hamlets, rural clusters, rural settlement areas, rural service centres, urban areas, urban policy areas, urban systems, or future urban use areas, or as otherwise prescribed by regulation; (“zone de peuplement”) vi

B. Amend 1.1.3. 8 (d) of the Provincial Policy Statement to read “the new or expanding settlement area is in compliance with the minimum distance separation formulae as interpreted by the municipality. However, where a settlement area expansion has been justified and there are no suitable alternatives that meet minimum distance separation formulae, the expansion can still be considered if impacts on agricultural operations are mitigated to the extent feasible.”, and further to

Amend 1.1.3.9 d) to read “the settlement area to which lands would be added is appropriately serviced and there is sufficient reserve infrastructure capacity to service the lands. Expansions to settlement areas under private servicing are only permitted subject to conformity with Section 1.6.

- ✓ **Expediting local planning deliberations by removing unnecessary, time-consuming barriers.** ROMA appreciates the Ministry’s efforts to re-imagine the Provincial Policy statement as reflected in the April 6 draft:

Eliminating the need for a comprehensive review every time a municipal council wishes to make adjustments to settlement area boundaries to accommodate growth.

- Bringing clarity to how additional development potential to the projected needs established in the official plan is addressed (e.g. at the time of the next update). [underlining added].
- Defining regional market area (Definitions) including the municipality’s right to use a smaller area, if so defined in an official plan.

ROMA's December 2022 submission on the Provincial Policy Statement drew attention to these barriers by suggesting that the Provincial Policy Statement:

- **Permit development of residential, commercial and industrial properties outside of settlement areas without requiring a comprehensive review. The Statement acknowledges that “Ontario’s settlement areas vary significantly in terms of size, density, population, economic activity, diversity and intensity of land uses, service levels, and types of infrastructure available” and that “it is in the interest of all communities to use land and resources wisely...” (Section 1.1.3) However subsequent sections of the Statement are prescriptive on how best to address development pressures, including:
 - **A strong emphasis on intensification and redevelopment within built-up areas, including provincial targets “representing the minimum target for affected areas” (those with targets established through provincial plans).**
 - **Focusing new development in designated growth areas (which may not exist in Rural Ontario) and linked to intensification and redevelopment targets.**
 - **An expectation of “timely provision of the infrastructure and public service facilities required to meet current and projected needs”.**
 - **Identification of a settlement area or expansion of a settlement area boundary “only at the time of a comprehensive review” and only when certain other conditions have been met. From a Rural Ontario perspective, the “notwithstanding” clause (1.1.3.9) does not address the most challenging aspects of the Statement (intensification and redevelopment targets and servicing capacity). Preservation of prime agricultural areas, referenced in multiple sections of the Statement, is in the interest of Rural Ontario municipalities and ROMA fully supports inclusion of related references in the Provincial Policy Statement. [Underlining added]****

Recommendation 13 A of ROMA's Attainable Housing Task Force requested that

- A. The Ministry of Municipal Affairs and Housing work with planning authorities in Rural Ontario to review and update land inventory municipalities are required to maintain. The objective of this collaboration is to ensure that land inventories maintained under the Planning Act reflect any development constraints and/or mitigation measures if applicable, and further to**

Provide upper-tier municipalities with flexibility to work with lower-tier municipalities on how 15 year plans for land and unit supply (required in the Provincial Policy Statement 1.4.1) are reflected across lower-tier municipalities within a regional market area. It is expected that lower-tier municipalities will be actively engaged in the formulation of new approaches to ensuring sufficient lands for a mix of housing options and densities. It is also expected that these discussions will include ways in

which municipal plans would use either primary or secondary settlement areas to address local housing needs. [Underlining added]

ROMA hereby reiterates its position with respect to municipal consents on prime agricultural land by bringing forward the Attainable Housing Task Force’s Recommendation 8 C:

- **Continue to permit residential consents on parcels outside prime agricultural areas as defined by the Provincial Policy Statement 2.3 Agriculture provided that the parcel itself is not considered prime agricultural land, and further that**

The Ministry of Agriculture, Food and Rural Affairs work with municipalities in Rural Ontario to develop criteria with which to assess the agricultural value of land parcels with soil Classes 4 through 7. The intent of the criteria is to enable municipalities to bring clarity to consent approvals for parcels of these classes by considering other factors such as the potential for the parcel to be viable as a stand-alone or part of a larger farm operation.

A parcel for which consent to division is granted would be required to meet municipal criteria set out in an Official Plan or Zoning bylaw (examples: lot size for a residential the lot, the size of the remaining parcel, ability to be serviced) and meets other applicable policies in the municipal Official Plan (ex. setbacks from sensitive areas, water bodies, agricultural uses). [Underlining was included in the original submission].

Remaining Concerns:

ROMA has four remaining concerns about the draft *Provincial Policy Statement*, to which we would invite you to direct your attention in the remaining weeks of the consultation period:

- **Retention of the term “rural character” with no accompanying definition (2.5 1 a).** As we observed in our original submission, this vague reference with no definition or signal as to who defines it locally, can be problematic when new development proposals are under consideration. ROMA had suggested that municipalities define or describe “rural character” in their official plans. If the Ministry has decided against this course of action, it may be better to remove the term “rural character” altogether and rely on the Section A 2.5 reference to *“planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels.”*

ROMA Recommendation 4 (Attainable Housing Task Force report):

- A. Amend the Provincial Policy Statement 1.1.4.1 (a) to delete the phrase “building upon rural character” and retaining “to leverage rural amenities and assets”.**

An alternative to Solution A above would be:

B. Amend the Provincial Policy Statement 1.1.4.1 (a) to read “building upon rural character, as defined by the planning authority through their Official Plan, and leveraging rural amenities and assets” and further to Amend 1.1.4.3 to read “... In incorporating a definition of “rural character in their Official Plan, planning authorities shall give consideration to rural character associated with different settlement areas, and reflect this character, as well as broader rural characteristics, scale of development, and the provision of appropriate service levels.” vii

This solution is similar in approach to that used to address Employment areas (see 1.3.2.2 in the Provincial Policy Statement). [Underlining added]

- **Restricted municipal access to the full range of methods for provision of water and sewer services (3.6 1 a).**

ROMA appreciates and strongly supports the inclusion of feasibility considerations in Chapter 3.6: “Where municipal sewage services and municipal water services are not available, planned or feasible, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development to support protection of the environment and minimize potential risks to human health and safety.” [underlining added].

ROMA is perplexed that the Ministry would provide an expedited path to approval for these types of systems for private developers that is not also available to municipalities. There is ample evidence across rural Ontario that communal services could be a cost-effective solution for affordable housing especially purpose-built rentals. ROMA strongly encourages the Ministry to work with the Ministry of Environment, Conservation and Parks to allow municipalities to use this servicing option if they so choose, and to include the words “private or municipal” in this section of the Statement.

In the same spirit, ROMA continues to seek an amendment to the current Provincial Policy Statement Section 1.6 to provide more flexibility to expand partial services where there are no negative impacts or land use compatibility issues. Restricting use of the partial services approach to only “failed” services (current PPS 1.6.6.5 and proposed 3.6. 5) or for “infilling and minor rounding out of existing development on partial services...” (proposed 3.6 5) is unnecessarily restrictive and may result in unfulfilled opportunities for increasing housing supply, especially for attainable housing and purpose-built rentals. [underlining added]

Recommendation 5 from the ROMA Affordable Housing Task Force report suggested:

- A. Delete the first sentence in the Provincial Policy Statement 1.6.6.2: “Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety,”***

An alternative to Solution A above would be:

- B. *Amend the Provincial Policy Statement Section 1.6 to provide more flexibility to expand partial services for attainable housing and purpose-built rentals into rural lands. This would include statements that acknowledge the role of communal and on-site private servicing options where there are no negative impacts or land use compatibility issues. This approach would increase reserve infrastructure capacity or support the provision of attainable housing and purpose-built rentals. The following amendments are provided as examples:* [Preceding underlining added; note that the reference does *not* restrict the use of communal services to private servicing options.]

Amend the Provincial Policy Statement 1.6.6.1 (e) to read: “where financially and technically feasible, conform to the servicing hierarchy outlined through policies 1.6.6.2, 1.6.6.3, 1.6.6.4 and 1.6.6.5. For clarity, planning authorities have the authority to consider use of conventional servicing options set out through these policies or new technologies, systems and methods that have been demonstrated to meet the specified conditions present in a settlement area or rural area. For further clarity, the preceding includes use of combinations of conventional and/or new technologies to meet servicing needs. This may include a municipal sewage or water service in combination with private services, provided that the specified conditions are met., and further to [Preceding underlining included in the original submission]

Amend the Provincial Policy Statement 1.6.6.2 to read: “Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety, provided that both the capital costs and the business case for ongoing operation of these systems is financially sustainable. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.”, and further to [Preceding underlining included in the original submission]

Amend the Provincial Policy Statement 1.6.6.5 to delete the word “only” in the introduction (Partial services shall only be permitted in the following circumstances:) and to add c) “where they can be demonstrated to be the most efficient, long-term solution to addressing the need for attainable housing and purpose-built rental housing, capitalizing on existing services (ex. wells) or new technologies (ex. biofilters) and will not negatively impact the environmental health of the area.” [Preceding underlining included in the original submission]

Amend the Provincial Policy Statement, last sentence in 1.6.6.5 to delete the word “only” (“In accordance with subsection (a), the extension of partial services into rural areas is only permitted to address failed individual on-site sewage and individual on-

site water services for existing development”; only permitted to address failed systems...) and further to [Preceding underlining included in the original submission]

Amend the Provincial Policy Statement 1.6.6.5, to add to the final paragraph: “or to introduce new technologies or systems that can extend the life or expand the capacity of an existing working system that will support additional housing, especially attainable housing and/or purpose-built rentals.” [Preceding underlining included in the original submission]

- **No action on updating algorithms used to calculate reserve capacity** for municipal sewer and water services. In our original submission, ROMA had requested that the Ministry work with the Ministry of Environment, Conservation and Parks to update their algorithm for calculating reserve capacity, reflecting actual operating experience, and that MECP would provide assurance that uncommitted reserve capacity estimates so generated would be acceptable for ECA licensing purposes. It is possible that the Ministry wishes to deal with this matter off-line/outside of the Provincial Policy Statement and if so, ROMA would be pleased to provide expertise from the municipal ranks to address this matter. Left untouched, these considerations will unnecessarily restrict municipalities’ ability to bring additional housing supply to the market and undermine all the Ministry’s good work in the Provincial Policy Statement review.

ROMA’s Recommendation 6 from the Attainable Housing Task Force report:

- A. The Ministry of the Environment, Conservation and Parks update the algorithm (method of calculation) used to calculate reserve capacity in sewage and water treatment plants. In using an indirect estimate of flow rates (the number of households or residential connections), the Ministry should adjust the formula to take into account the significant reductions in water use (and therefore sewage produced) as a result of increasingly efficient fixtures and appliances.***
- B. The Ministry of the Environment, Conservation and Parks provide latitude to municipalities to make calculations using an updated algorithm that takes into account their actual experience in operation of their water and sewer systems. This is particularly important to the calculation of average daily flow rates per capita and understanding actual system usage by the current population and households.***

Beyond use of estimating the extent of conventional development that can be supported by the uncommitted reserve hydraulic capacity, municipalities in Rural Ontario have significant potential to add housing units through secondary suites, which would effectively lower the average daily flow rates per capita while providing a practical way to respond to the need for purpose-built rentals.

Further, municipalities anticipate assurance from the Ministry that by improving the accuracy of the algorithm, the uncommitted reserve capacity estimates so generated will be accepted for the purposes of Environmental Compliance Approval (ECA) licensing. [Underlining added]

- **Too narrow a focus on just the education system (school capacity) for housing supply need signals.**

In the spirit of complete communities, ROMA recommends the integration of information from other service providers (in addition to school boards), such as healthcare organizations, social housing service managers, employment centres, food banks, and passenger transportation providers. Information from these organizations would provide a much better understanding of what will be required to “round out” or “complete” communities.

ROMA offered a specific recommendation (13 B) on this matter in its Attainable Housing Task Force Report, that is entirely consistent with the “complete communities” concept now articulated in the draft Provincial Policy Statement:

B. The Ministry of Municipal Affairs and Housing work with planning authorities to identify and analyze non-traditional data sources to better understand/ “triangulate” the current housing situation in rural areas and get a sense of dynamics/direction of change in drivers affecting the housing market in Rural Ontario (examples: recent population shifts, population and employment forecasts, school closures, hospital closures, capital investment in education and healthcare services, changing use of food banks, wait lists for social housing). The objective of this collaboration is to develop a shared understanding of the growth potential and related housing implications for Rural Ontario. [Underlining added]

In closing, ROMA encourages the Ministry to stand firm on the enlightened changes already proposed and highlighted earlier in this cover note. ROMA remains ready to work with the Ministry further to translate the many positive signals into action on the ground at the municipal level.

For further information or discussion, please contact me.

Robin JONES

Yours truly

Robin Jones

Chair, Rural Ontario Municipal Association (ROMA) 2023-24



Comparative Summary – comparison Between Draft PPS and ROMA Submission to ERO-Posted Consultation Document

July 14, 2023

New Draft PPS (consultation ends August 4/23)	Linkage to Current PPS (if any) and ROMA
<p>No definitions of either attainable housing or purpose-built rentals; definition of “affordable housing” incorporated in Bill 23 Schedule 3; definition of Affordable Market Rent (or Ownership) has not yet been published in</p>	<p>Section A: suggested definitions for both Attainable Housing and Purpose-Built Rental Housing</p>
<p>Geographic Scale of Policies section includes recognition that “local context is important” and that “not all policies will be applicable to every site, feature or area”. Also states that “the policies of this Policy Statement represent minimum standards”</p>	<p>Section A: Explicit recognition of authority of municipal councils to interpret key planning documents</p> <p>Section B – 15.6 Delegation of Authority to Speed Up and Increase Feasibility of Implementation – emphasis on reflecting local</p>
<p>No deletion of “rural character” or definition of the term</p>	<p>Section A - 2.1 Rural Character: Requested Deletion for reference to a municipally-derived definition to be incorporated into Official Plan</p> <p>Section A – 2.5: include direction to municipalities... “planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and</p>

Reference in preamble to: “Growth and Development will be focused within urban and rural settlement areas”
[Underlining added]

Chapter 2.4: allows for impact on adjacent or close agricultural lands provided MDS rules are observed and with minimization and mitigation to the maximum extent feasible or as feasible, and agricultural impact assessment or equivalent analysis, based on provincial guidance...”

Definition of “Area of Settlement” has been revised: “means urban areas and rural settlement areas (such as cities, towns, villages and hamlets). Ontario’s settlement areas vary significantly in terms of size, density, population, economic activity, diversity and intensity of land uses, service levels, and types of infrastructure available.

Settlement areas are:

- a) Built-up areas where development is concentrated and which have a mix land uses: and

Chapter 2.3 4 refers to “impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized or mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance...”

Reference to “minimum distance separation formulae” within settlement areas (Chapter 2.3. 4) may or may not be the same as the reference in Chapter 2.5 5) focused on “new or expanding livestock facilities (or 4.3.2 3 or lot creation in prime agricultural areas (4.3.3 4) or 4.3.5 1.

Section A - 3: Areas of Settlement to emphasize density, broad mix of uses rather than “urban” uses

Section B – 8.1 “the new or expanding settlement area is in compliance with the minimum distance separation formulae as interpreted by the municipality. However, where a settlement area expansion has been justified and there are no suitable alternatives that meet minimum distance separation formulae, the expansion can still be considered if impacts on agricultural operations are mitigated to the extent feasible.”

ROMA’s Attainable Housing Task Force suggested a definition of “area of settlement” as meaning “an area of land designated in an official plan for (delete urban) higher density and a broader mix of uses, including towns, villages, hamlets, rural clusters, rural settlement areas, rural service

Section B – 8: Residential Land Supply – Provide Interpretive Authority on Settlement Area Boundary Expansions – included MDS formulae as interpreted by the municipality
8.1 explicitly provided for expansion “if impacts on agricultural operations are mitigated to the extent possible”

Section B – 8.2: Minimum Distance Separation compliance expectations outside of settlement areas – clarity requested between PPS, OMAFRA MDS document and Guideline 43

The Draft PPS provides for lot creation as follows:

4.3.2 New land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.

A principal dwelling associated with an agricultural operation may be permitted in prime agricultural areas as an agricultural use, in accordance with provincial guidance, except where prohibited in accordance with policy 4.3.3.1 b)

Subordinate to the principal dwelling, up to two additional residential units may be permitted in prime agricultural areas, provided that:

- a) Any additional residential units are within, attached to, or in close proximity to the principal dwelling;
- b) Any additional residential unit complies with the minimum distance separation formulae;
- c) Any additional residential unit is compatible with, and would not hinder, surrounding agricultural operations; and
- d) Appropriate sewage and water services will be provided.

The additional residential units may only be severed from the lot containing the principal dwelling in accordance with policy 4.3.3.1.

Sections 4.3.3 and 4.3.4 provide additional guidance on lot creation and adjustments and removal of land from prime agricultural areas (the latter is permitted only for expansions of or identification of settlement areas...)

Recommendation 8 C from Attainable Housing Task Force report

- ***Continue to permit residential consents on parcels outside prime agricultural areas as defined by the Provincial Policy Statement 2.3 Agriculture provided that the parcel itself is not considered prime agricultural land, and further that***

The Ministry of Agriculture, Food and Rural Affairs work with municipalities in Rural Ontario to develop criteria with which to assess the agricultural value of land parcels with soil Classes 4 through 7. The intent of the criteria is to enable municipalities to bring clarity to consent approvals for parcels of these classes by considering other factors such as the potential for the parcel to be viable as a stand-alone or part of a larger farm operation.

A parcel for which consent to division is granted would be required to meet municipal criteria set out in an Official Plan or Zoning bylaw (examples: lot size for a residential the lot, the size of the remaining parcel, ability to be serviced) and meets other applicable policies in the municipal Official Plan (ex. setbacks from sensitive areas, water bodies, agricultural uses). [Underlining was included in the original submission].

Reference from Opportunities for Rural Ontario in a Post-COVID World (page 60), as part of “Protect Sensitive Environments and Agricultural Lands”:

- **ROMA supports the protection of agricultural lands, considering them vital**

<p>Preamble: “Municipalities will work with the Province to design complete communities with increased access to housing, employment, schools, transportation options, recreation ad public spaces, and <u>services that are equitable and sustainable for all Ontarians.</u>” [underlining added]</p> <p>Chapter 2 – 2:1: Planning for People and Homes includes a direct reference to complete communities; includes “and other uses to meet long-term needs.”</p> <p>New (defined) term – Complete Communities as a planning goal: "means places such as mixed-use neighbourhoods or other areas within cities, towns and settlement areas that offer and support opportunities <u>for equitable access to many necessities for daily living for people of all ages and abilities,</u> including an appropriate mix of jobs, a full range of housing, transportation</p>	<p>No direct reference to the concept; however, ROMA did seek a direct reference to “healthy communities” (Section B – 9.2), including a preamble to 1.1.1 (b) tying in housing: “accommodating an appropriate range and mix of residential types)</p> <p>Section B – 15: Look Beyond School Capacity for Housing Supply Need Signals – ROMA suggested integrating information from other service providers (ex. healthcare, food banks, wait lists for social housing)</p>
<p>Appendix lists 29 “large and fast-growing municipalities</p> <p>New (defined) term – Strategic growth areas: “means within settlement areas, <u>nodes, corridors,</u> and other areas that have been <u>identified by municipalities</u> to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.[underlining added]</p> <p>... lands along major roads, arterials, or other areas with existing or planning frequent transit service or higher order transit corridors may also be identified as strategic growth areas.”</p> <p>Chapter 3.1: “Planning and investments in infrastructure and public service facilities should be <u>prioritized to</u></p>	<p>Section A – 4: Possibility of Growth Centres in Both Urban and Rural Areas</p> <p>Section B – 13.2: ROMA requested a broader definition of fast-growing municipalities and broadening the scope of major provincial infrastructure investments to include highways and roads, and “passenger transportation” not just “transit”.</p> <p>Section B: 11: ROMA sought the authority to permit adoption of inclusionary zoning policies without requiring a) implementation of development permit system to replace zoning</p>
<p>Chapter 2.1 Planning for People and Homes – allows the Minister to make a zoning order that will then automatically add any resulting development potential to the projected needs established in the official plan. This will be incorporated into the official plan at the time of</p>	<p>Section B – 12.1 Growth Management - ROMA sought permission for municipalities to define their own regional market area; undertake their own analyses of distribution and movement patterns for population</p>

<p>Description of “public service facilities”: “means land, buildings and structures, including but not limited to schools, hospitals and community recreation facilities, for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health, child care and educational programs, including elementary, secondary, post-secondary, long-term care services, and cultural services.”</p>	<p>ROMA’s submission did not define these facilities</p>
<p>Definition of “Rural Area” and “Rural Lands”: "Rural areas: means a system of lands within municipalities that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and resource areas." "Rural lands: means lands which are located outside</p>	<p>ROMA did not comment on these definitions directly but addressed related issues (settlement area boundaries, servicing, transit, agricultural uses)</p>
<p>Chapter 4.3 on General Policies refers to taking an “agricultural systems approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive</p>	<p>Section B – 14.1: Continue to permit residential consents on parcels outside prime agricultural areas, and that OMAFRA develop criteria to assess agricultural value of land parcels with soil classes 4 to 7.</p>
<p>Chapter 5.8 appears to provide some latitude for municipal retention of Site Plan Control for small developments even in “those portions of hazardous lands and hazardous sites where the effects and risks to public safety are minor, could be mitigated in accordance with provincial standards, and where all of the following are demonstrated and achieved...” (the “following” refer to compliance with standards, the site is still accessible even during floods, erosion etc., new hazards</p>	<p>Section A – 5: Municipal Retention of Site Plan Control Authority for Small Residential Development</p>

<p>Section 2.2 Housing: refers directly to coordinating land use planning and planning for housing with Service Manager to address the full range of housing options, <u>including housing affordability needs...</u>[Underlining added]</p> <p>Comprehensive description of “housing options”: “means a range of housing types such as, but not limited to single-detached, semi-detached, rowhouses, townhouses, stacked townhouses, multiplexes, <u>additional residential units, tiny homes, laneway housing, garden suites, rooming houses, multi-residential buildings,</u> including low an and mid-rise apartments. The term can also refer to a variety of housing arrangements and forms such as, but not limited to, <u>life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community homes, additional</u></p>	<p>Section B – 9.2: ROMA sought a direct reference to “healthy communities” including a preamble to 1.1.1 (b) tying in housing: “accommodating an appropriate range and mix of residential types)</p> <p>Section B – 9: Ensure the Policy Environment Highlights the Supply of Attainable Housing - ROMA’s response highlighted definitions</p> <p>Section B – 10.1: ROMA sought a direct reference to Tiny Homes as part of the housing mix</p>
<p>Chapter 3.6: Extensive section referring to “efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services...”</p> <p>“Where municipal sewage services and municipal water services are <u>not available, planned or feasible,</u> private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development to support protection of the environment and minimize potential risks to human health and safety.” [Underlining added]</p> <p>“Planning authorities may allow lot creation where there is confirmation of sufficient reserve sewage system capacity and reserve water system capacity.”</p>	<p>Section A – 6: Greater flexibility on Methods for Provision of Water and Sewer Services – requested removal of hierarchy of service types or incorporation of references to ‘where financially and technically feasible...” and authority for municipalities to consider combinations of conventional and/or new technologies to meet servicing needs.”</p> <p>A plan for communal services can help to make housing more affordable in rural areas of Ontario that are not served by municipal water and sewer systems. Communal servicing has the potential to support more compact, land-efficient development than is not possible with private servicing, at a lower cost than is possible with centralized municipal services, and to</p>
<p>No reference in draft PPS on this matter</p>	<p>Section A – 7: Update Algorithms for Calculating Reserve Capacity – ROMA sought an updated algorithm (MECP) and incorporation of actual experience, as well as assurance uncommitted reserve capacity estimates so generated would be acceptable for ECA licensing purposes.</p>



<p>Preamble reference to: “Meaningful early engagement and constructive, cooperative relationship-building between planning authorities and Indigenous</p>	<p>Section B – 14.2: Continue to protect natural heritage, including archaeological resources, including assessments of archaeological</p>
<p>Not mentioned</p>	<p>Section B – 15.3: Streamlined Planning Framework – “one window” approach plus inter-</p>
<p>Key elements reflected in preamble</p>	<p>Section B – 15.4: Design Processes and Policies to Focus on Most Critical Outcomes – with a near-term focus on housing, innovative</p>
<p>Reflected somewhat in preamble and in references to strategic growth areas as defined by municipalities</p>	<p>Section B – 15.5: Make Solutions Relevant to Both Provincial and Local Interests</p>