

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON, M7A 2J3

August 4, 2023
File 9006

**RE: Proposed Provincial Planning Statement
5842 8th Line
Town of New Tecumseth**

Weston Consulting has been retained by Beeton 3 Limited Partnership, the owner of the lands municipally known as 5842 8th Line in the Town of New Tecumseth (herein referred to as the “Subject Lands”) to comment on the proposed 2023 Provincial Planning Statement (the “proposed PPS”). The new planning policy instrument proposes to repeal *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the “Growth Plan”) and the existing *Provincial Policy Statement* (the “PPS”) and replace both with an integrated policy statement.

In February 2023, we submitted written correspondence on behalf of the landowner to comments on the County of Simcoe’s OPA No. 7 (Attachment 1) to request a Settlement Area Boundary Expansion (SABE) to include the Subject Lands within the Beeton settlement area. OPA No. 7 forecasts the Town’s population to increase to 35,110 residents between 2021 and 2051. A SABE to include the Subject Lands will contribute to achieving this target. In our opinion, the proposed PPS provides policy direction that will supports the population projection outlined in OPA No. 7 and is in line with our SABE request to include the Subject Lands.

Description of the Subject Lands and Site Context

The Subject Lands are located on the north side of 8th Line, east of the 8th Line and Patterson Street intersection, adjacent to the Beeton Settlement Area. The Subject Lands are legally described as PT LT 12 CON 8 TECUMSETH, PT 1 51R18661 ; NEW TECUMSETH. The Subject Lands are approximately 41.788 hectares (103.26 acres) in size and have approximately 570.37 metres of frontage along 8th Line. The Subject Lands are currently vacant except for one single detached dwelling and two accessory sheds. Farmland and agricultural uses surround the Subject Lands in all directions and the Beeton Settlement Area is located to the west.



Figure 1: Aerial Photo of the Subject Lands

Review of Provincial Planning Instrument

On April 6, 2023, the province released the proposed 2023 Provincial Planning Statement for comment. The objectives of the proposed PPS are:

1. Generate an appropriate housing supply;
2. Make land available for development;
3. Provide infrastructure to support development; and
4. Balance housing with resources

This following section provides commentary on the proposed PPS policies, provided with redline revisions, specifically those related to Settlement Area Boundary Expansions, Strategic Growth Areas, Rural lands in municipalities and sewage, water and stormwater.

Section 2.3: Settlement Areas and Settlement Area Boundary Expansions

Policy 2.3.1 of the proposed PPS directs that Settlement Areas shall be the focus of growth and development. This policy is consistent with the existing PPS, however proposed Policy 2.3.2 introduces a more permissive framework to achieve provincial objectives:

*2.3.2 Land use patterns within settlement areas ~~shall~~ **should** be based on densities and a mix of land uses which:*

- a) efficiently use land and resources;
- b) optimize existing and planned infrastructure and public service facilities;
- c) support active transportation;
- d) are transit-supportive, as appropriate; and
- e) are freight-supportive

The introduction of the word “should” creates instead of “shall” creates a more flexible policy framework for development patterns. The intent of the of the policy is to direct growth and development towards settlement areas, yet, the language enables a broader scope that permits SABEs to similar objectives. Accordingly, the proposed PPS introduces policy 2.3.3, which states,

Planning authorities should support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.

Where intensification within a settlement area is not feasible, the PPS establishes a test for municipalities to identify new settlement areas or expansions. According to Policy 2.3.4:

2.3.4 In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities should consider the following:

- a. *That there is sufficient capacity in existing or planned infrastructure and public service facilities*
- b. *The applicable lands do not comprise specialty crop areas*
- c. *the new or expanded settlement area complies with the minimum distance separation formulae;*

- d. impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and
- e. *The new or expanded settlement area provides for the phased progression of urban development*

The proposed PPS eliminates the requirement for municipalities to undertake a Municipal Comprehensive Review (MCR) and Policy 2.3.5 of the proposed PPS states,

Planning authorities are encouraged to establish density targets for new settlement areas or settlement area expansion lands, as appropriate, based on local conditions. Large and fast-growing municipalities are encouraged to plan for a minimum density target of 50 residents and jobs per gross hectare.

The current PPS policy 1.1.3.9 states that a municipality may permit adjustments to a settlement area boundary outside a MCR review process, granted that there would be no net increase in land within the settlement areas, the adjustment would support the municipality's ability to meet intensification and redevelopment targets established by the municipality and that adequate servicing is provided.

According to Policy 2.3.5 of the proposed PPS, a MCR is not required to approve a SABE, which can be granted subject to the tests established in Policy 2.3.4. We are supportive of the proposed policy framework. Removing existing Policy 1.1.3.9 and replacing it with the language outlined in proposed Policy 2.3.4 will contribute to the objectives of incorporating additional lands into settlement areas such as the Beeton Settlement Area.

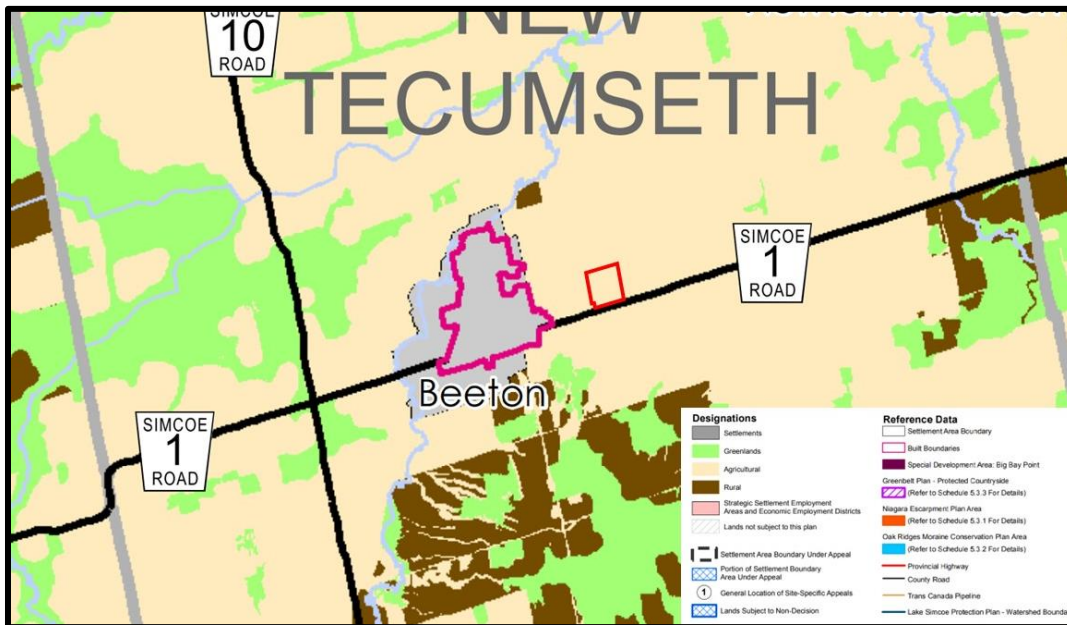


Figure 2: Settlement Area Boundary for Beeton, according to Schedule 5.1 of the Simcoe Official Plan

Section 2.4: Strategic Growth Areas

Section 2.4.1 of the proposed PPS establishes general policies for Strategic Growth Areas, defined as areas that have been identified by municipalities to be the focus for accommodating intensification and higher density mixed uses. Policy 2.4.1 directs planning authorities to identify minimum density targets for these areas:

- 2.4.1 To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, planning authorities, may, and large and fast-growing municipalities, shall identify and focus growth and development in strategic growth areas by:*
- a. Identify an appropriate minimum density target for each strategic growth area, and*
 - b. Identifying the appropriate type and scale of development in strategic growth areas and transit of built form to adjacent areas*

We support policy direction to establish minimum density targets to achieve complete communities and this goal is consistent with our request for the Subject Lands to be included in the Beeton settlement area. As stated in our February 2023 letter, a SABE to include the Subject Lands will contribute to the growth targets established in OPA No. 7 and will further support the objectives of Policy 2.4.1 to provide for a range and mix of housing options, intensification and mixed-use development.

2.6 Rural Lands in Municipalities

Policy 2.6.1 of the proposed PPS outlines permitted uses on Rural lands:

2.6.1 on rural lands located in municipalities, permitted uses are:

- a) the management or use of resources;*
- b) resource-based recreational uses (including recreational dwellings not intended as permanent residences);*
- c) residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate sewage and water services; Residential development, including lot creation and multi-lot residential development, where site conditions are suitable for the provision of appropriate sewage and water services.*
- d) agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices, in accordance with provincial standards;*
- e) home occupations and home industries;*
- f) cemeteries; and*
- g) other rural land uses.*

We support the proposed policy direction, as it will contribute to projected population forecasts and housing demands in municipalities and is in line with the SABE request for the Subject Lands. Given their proximity to the Beeton Settlement Area and the expedited availability of infrastructure and resources, the inclusion of the Subject Lands within the settlement area will contribute to the population forecasts outlined in OPA No. 7. This is a key objective of the proposed PPS as demonstrated by the changes to Policy 2.6.1. We support the proposed policy as it will increase the supply of housing options across the province.

3.6 Sewage, Water and Stormwater

Policy 3.6.1(a) of the proposed PPS states that Planning for sewage and water services shall:

Accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services

We support the proposed policy to accommodate future growth in a manner optimizes existing resources. This is consistent with the opinion in our February 2023 letter to incorporate the Subject Lands within the Beeton settlement area.

Conclusion and Next Steps

This letter provides commentary on proposed PPS policies pertaining to Settlement Area Boundary Expansions, Strategic Growth Areas, Rural lands in municipalities and sewage, water and stormwater. We support the policy direction of the Province of Ontario towards simplifying the process specific to Settlement Area Boundary Expansions, the general policies associated with strategic growth areas, Rural lands in municipalities as well as sewage, water and stormwater policies. The proposed policies of the PPS would allow for settlement area boundary expansions to be considered in a more efficient manner and assist in facilitating new development by the local planning authorities. Furthermore, the policies of the proposed PPS enable the optimization of infrastructure, the provision of intensification and redevelopment opportunities. We support the proposed PPS policy framework in relation to growth management and urban boundary expansion policies, which would permit greater flexibility in having the lands developed in the approach based on good planning principles.

Should you have any questions or comments regarding the contents of this letter, please do not hesitate to contact the undersigned at extension 241.

Yours truly,

Weston Consulting

Per:



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