



Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

August 4, 2023

**RE: FILE NO: 019-6813
REVIEW OF PROPOSED POLICIES
A PLACE TO GROW AND PROVINCIAL POLICY STATEMENT TO FORM A NEW PROVINCIAL POLICY
INSTRUMENT**

Cachet Homes have reviewed the above-noted documents and wish to submit this letter in response to the Province's new draft Provincial Planning Statement ("PPS"). The comments are in regard to our land holdings across the Province, particularly in the Greater Golden Horseshoe; Cachet holds lands in the City of Brantford, City of Hamilton, County of Wellington (Arthur), Centre Wellington (Elora), the Region of Waterloo (City of Cambridge, New Hamburg, City of Kitchener), Oxford County (Woodstock), City of Stratford, and Dufferin County (Orangeville). Our understanding is that the proposed policies of the PPS are intended to replace the Growth Plan for the Greater Golden Horseshoe. Based on the policies that we have reviewed, the following comments and considerations are offered:

1. Integrated province-wide land use planning policy document

The province currently has the Provincial Policy Statement under the *Planning Act* and the Growth Plan under the *Places to Grow Act*. Cachet is supportive of combining elements of the Growth Plan and the Provincial Policy Statement into one land use policy document to provide a simplified approach to land use planning.

2. Removal of Provincially Significant Employment Zones (PSEZ) (as proposed);

The province has proposed the removal of the PSEZ which was previously put forward in the 2019 Growth Plan. Cachet is supportive of this removal and further agrees that the PSEZ restricted land uses and flexibility required to build complete communities.

3. First-party appeal rights on Employment Area conversions;

The new definition of "employment" within the PPS emphasizes how employment lands are perceived for compatibility and value, and reinforces the importance of industry – manufacturing, large-scale warehousing, etc. The term conversion has now been changed to "removal", allowing municipalities to "remove" employment lands provided there is a demonstrated need for the removal and such removal does not impact the viability of the employment area. Cachet supports this direction.

However, despite removing the PSEZ zones, the Planning Act continues to prohibit appeals to employment area "removals". Cachet recommends that these "removal" applications which would be in the form of Official Plan Amendments be subject to first-party appeals provided that certain tests/criteria have been met as prescribed in Section 2.8 of the PPS.



4. Noise and Airport policies;

The current PPS allows for infill residential development and other sensitive land uses up to 30 NEF. In addition, the PPS outlines that these land uses may occur in areas that are above 30 NEF, similar to Transport Canada guidelines, but must demonstrate that there will be no negative impacts to the long term function of the airport, as well, inform future purchasers of the potential noise impacts. While we agree with the policy approach as prescribed in the new PPS, the policy language should be more descriptive such that municipalities must be in compliance with the policies of the PPS and not be permitted to implement their own NEF policies. This will ensure consistency between Federal, Provincial and Local governments and policies while developing in and around NEF areas.

In addition to the above, airports and airport operators seldom update their contour mapping despite planes becoming more efficient and decreasing their noise emissions. The PPS should make reference to, and encourage airports and airport operators to update their contour mapping at least once every ten years. If no update has occurred in that period, updating mapping through appropriate noise and compatibility studies by the municipality and/or private development applications should be permitted and render updates to such NEF mapping.

5. Privately Initiated Secondary Plans;

The proposed PPS does not make a direction on Secondary Plans or planning. Given that an abundance of land has been brought into urban boundaries through the various municipal comprehensive reviews, the PPS should acknowledge that secondary plans are a vital part of the planning process and that they may be prepared and completed by private landowners provided the municipalities are involved in the process and a public consultation strategy is implemented. We believe that privately initiated secondary plans will assist both the Province and local municipalities in achieving the housing needs and targets by speeding up the technical reporting and documentation required to facilitate a secondary plan. Further, inserting criteria that direct municipalities to allow or accept privately initiated secondary plans may be helpful, such as proximity to existing built-up areas, servicing availability, infill development, etc. These criteria would allow municipalities to evaluate secondary plan areas and allocate staff resources appropriately when intaking and processing privately initiated secondary plans.

6. Policy Clarity

As a general comment, Cachet believes that there are several areas within the new PPS where policies are left for interpretation and are ambiguous in nature. This lack of clarity has the potential to trigger additional appeals and disputes, causing further delays in making housing units available on the market. We encourage the province to implement clear and precise guidelines which all stakeholders can agree, which will ultimately help streamline the planning approval process in the province.

The above comments are intended to be considered by the Ministry when reviewing and finalizing the new PPS. We hope the comments are received and implemented into the new PPS. We appreciate the Ministry providing an opportunity for comment on the document and would welcome further discussion if necessary.



Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Shaheen", with a long horizontal flourish extending to the right.

Ramsey Shaheen
President
Cachet Homes