

**August 3, 2023**

Hon. Steve Clark  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, Ontario  
M7A 2J3

**Re: Comments on Proposed Provincial Planning Statement  
On Behalf of Prica Global Enterprises**

The Planning Partnership (“TPP”) acts as the land use planning consultant for Prica Global Enterprises (“Prica”). Prica is one of the largest home builders in the Kitchener-Waterloo area, having constructed over 3,100 student housing rooms and 2,700 dwelling units over the last 20 years in the City of Waterloo.

Prica also oversees significant agricultural and production operations, owning and operating four fruit orchards throughout the Greater Golden Horseshoe, with plans to plant new orchards in the near future, and also operating a distillery that produces brandy distilled from the produce grown on these and other local orchards. This form of value-added farm production is vitally important to ensuring the long-term viability of these and other agricultural lands, and also for supporting tourist interest that can provide another supporting revenue stream to the broader agricultural community.

In its capacity as both a home builder and agricultural producer, Prica is significantly influenced and impacted by Provincial planning policy. As an example, nearly all of Prica’s land development projects are in the form of higher density intensification, often within Major Transit Station Areas, which is strongly promoted and required by the Growth Plan for the Greater Golden Horseshoe. The Provincial Policy Statement likewise permits value-retaining agricultural facilities and other on-farm diversified uses, such as a distillery, in order to support the viability of the Province’s farmers.

As such, Prica has been keenly following the Ministry’s recent changes to the land use planning system in Ontario through Bills 109 and 23, and is also very interested in the recently released Draft Provincial Planning Statement. In particular, Prica is interested in opportunities to streamline the cumbersome planning application process in order to expedite the construction of new homes for Ontario’s rapidly expanding population, and to better support Ontario’s farmers through appropriate permission for farm-supporting uses and activities.

On behalf of Prica, we would like to highlight the following new policies that are proposed for inclusion within the Provincial Planning Statement, and which are strongly supported by Prica:



- **Housing & Intensification** – The continued focus on intensification as a primary driver of new housing to accommodate forecast population growth, and in particular the continued emphasis on intensification within Major Transit Station Areas, will support the ongoing development of new housing in areas that are already well-served by public transit and other public services. This will support the Ministry’s efforts to address the current housing crisis and the ongoing undersupply of housing to accommodate our Province’s rapidly growing population.
- **Employment Area Conversions** – Conversions are a long, cumbersome process as a result of the current requirement for any Conversion to be considered only through a Municipal Comprehensive Review. This represents a significant time delay and associated financial obstacle to the potential redevelopment and intensification of unused or underutilized employment lands in areas that are better suited for mixed-use development and can support new housing. By removing the requirement for a Conversion to proceed only through a Municipal Comprehensive Review, this will allow developers and municipalities to more quickly leverage opportunities for conversion, providing expanded opportunities to accommodate new housing.
- **Housing in Agricultural Areas** – Policies 4.3.2.4 and 4.3.2.5 explicitly permit a principal residential dwelling associated within an agricultural operation as an agricultural use, and allow for up to two additional residential units subordinate to the principal dwelling. While temporary farm help accommodation is typically permitted as an accessory agricultural use, additional permanent housing has historically been severely restricted. This results in significant operational challenges as Prica’s agricultural and production operations often require year-round oversight from farm workers. Providing on-farm housing for these workers will significantly improve farm operations and streamline transportation and other costs.
- **Lot Creation in Agricultural Areas** – Building on the slightly expanded permission for housing in agricultural areas, policy 4.3.3.1(a) would likewise allow up to three lots to be created, subject to a variety of conditions aimed at protecting specialty crop areas and prime agricultural lands. Modern farming and production activities often require significant investment in equipment, land and buildings, which necessitates large loans often tied to the land. By allowing for limited lot creation tied to appropriate farm-supporting housing opportunities, this will provide farmers with additional flexibility to secure and administer any financial obligations. It will also support the ongoing generational transfer of farm operations within farming families.
- **Rural Housing** – Policy 2.6.1 permits residential development, including multi-lot development (subject to appropriate site conditions and availability of requires services) on rural lands. Rural lands specifically exclude prime agricultural areas and so represent a potential opportunity to accommodate some limited form of additional residential development. This would further diversify the housing options available to Ontarians, and could also better support active agricultural operations by providing additional housing opportunities in proximity.



Thank you for the opportunity to provide public input on the proposed new Provincial Planning Statement. We look forward to continuing our participation as the Province seeks to update the land use planning system and Provincial planning policy framework.

Sincerely,

A handwritten signature in black ink that reads "Ron Palmer". The signature is fluid and cursive, with a large initial 'R' and 'P'.

Ron Palmer, Principal

A handwritten signature in blue ink that reads "Brandon Simon". The signature is fluid and cursive, with a large initial 'B' and 'S'.

Brandon Simon, Associate