



County of Brant Feedback on:

Review of A Place to Grow and Provincial Policy Statement

ERO Posting #019-6177; Comment period open until December 30, 2022

Discussion Questions

General Comments

Given the implications to municipalities, it is recommended that the Province commit to an enhanced municipal consultation process, such as by establishing in-person technical working groups with rural and urban municipalities, Indigenous communities, and other applicable stakeholders.

At a high-level, the County of Brant supports the integration of the A Place to Grow and the Provincial Policy Statement (PPS) into one province-wide policy document, which is intended to simplify the land use planning process by eliminating duplicate policies that are often similar but conflicting and confusing to interpret.

Creating one set of policies that provides clear direction on where development may or may not be permitted to create complete communities that protects the environment, cultural heritage and public health would streamline the development approvals to create more housing.

Question 1

What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?

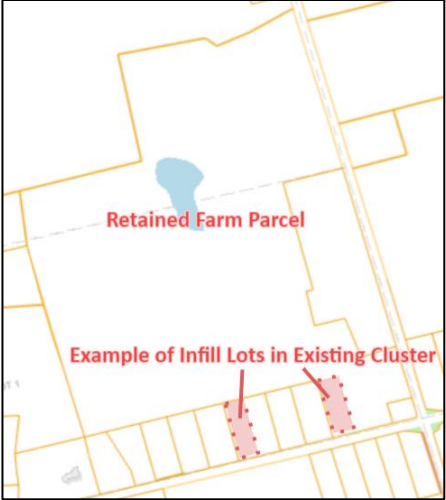
Proposed Core Elements	County Response
TIMELY IMPLEMENTATION OF THIS POLICY PROPOSAL	While we appreciate the Province giving the opportunity for municipalities to provide feedback on this policy proposal, this specific proposal merging the PPS and A Place to Grow is imperative to our New Official Plan. We request that the Province make a decision and provide an updated integrated Provincial Policy document as soon as possible.

Settlement Area Boundary Expansions	<p>As a rural community that relies heavily on the agricultural land base for food production and the agri-food network, the County of Brant would support strict limits on the expansion of settlement area boundaries where increasing density within existing boundaries and incentivizing would address a large portion of the need for housing and mixed use developments and set growing municipalities up for efficient land use, transportation and resource protection over the long-term.</p> <p>Streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth.</p>
Growth Forecasting Schedules Schedule 3, A Place to Grow	<p>Schedule 3 of the Growth Plan establishes minimum long-term population and employment forecasts for upper-tier and single-tier municipalities in the G.G.H. to the year 2051.</p> <p>The Ministry of Finance (M.O.F.) also establishes long-term population forecasts for all Ontario Census Divisions (C.D.s), which typically represent upper-tier municipalities, separated municipalities, and single-tier municipalities. The M.O.F. forecasts are not recognized as official forecasts for planning purposes in Ontario; however, they are updated annually and can be used to inform population forecasts in Official Plans. Under a consolidated Growth Plan and P.P.S., consideration would need to be given to the role and source of growth forecasts established by the Province for all Ontario municipalities.</p> <p>Schedule 3 Growth Plan: Will this Schedule be kept for those GGH municipalities NOT on the Housing Target List?</p> <p>Alternatively, will you be asking Outer Ring Municipalities in the GGH to provide Residential Housing numbers? This information was in our draft MCR.</p> <p>What about Employment Land Forecasts and job Forecasts?</p>
Land Needs Assessment Methodology for the Greater Golden Horseshoe, 2020 Section 2.2.1.5 A Place to Grow	<p>The Growth Plan requires that upper- and single-tier municipalities in the Greater Golden Horseshoe use this methodology to assess the quantity of land required to accommodate forecasted growth. This document requires to</p>

	<p>be referenced as our draft Municipal Comprehensive Review has been calculated on this methodology.</p> <p>Ensuring key growth management and Land Needs Assessment tools are available to properly plan for growth. The County of Brant has a revised Schedule 3 Forecasts to 2051 in which our draft New Official Plan has been calculated using the Provinces' Land Needs Assessment methodology, 2020.</p> <p>All other Ontario municipalities rely on the 1995 Provincial Projection Methodology Guidelines (P.P.M.G.) for guidance regarding the technical approach to growth forecasts and urban land need assessments. These are out of date.</p> <p>The methodology requires guidance on Community Area Land Needs Assessment and Employment Area Land Needs Assessment. This document cannot be forgotten with the removal of the Growth Plan. It is also tied to Housing Supply Potential and Allocation of Housing Needs.</p> <p>The County of Brant recommends that the municipalities in the GGH continue to utilize this methodology and the integrative policy document reference this document.</p>
<p>A Place to Grow, Section 2</p> <p>Where and How to Grow</p>	<p>Include a new section in the integrated policy document specific for rural municipalities with limited or partial or no water/sewer infrastructure. Include a section specific to the Outer Ring Municipalities of the GGH.</p> <p>Acknowledge many rural municipalities do not have mass transit.</p> <p>Include a section on Managing Growth and where to direct the majority of growth.</p> <p>Include further policy direction on Complete Communities, Housing mixes and ranges, and affordable housing.</p>
<p>Excess Lands Policy – GGH Outer Ring Municipalities</p> <p>Section 2.2.1.6 A Place to Grow</p>	<p>Please advise on the intent of this policy in the lack of clear direction from the Province and no response on our draft Official Plan that declared Excess Lands.</p> <p>This policy states for Outer Ring Municipalities, if there is a residential surplus of land, then these municipalities WILL prohibit development on all excess lands to the horizon of this plan.</p>

<p>A Place to Grow, Section 2.2.2</p> <p>Delineated Built Up Areas (b)</p> <p>Density and Intensification Targets</p>	<p>The Growth Plan has specific Density and Intensification Targets listed for Outer Ring Municipalities of the GGH. The County of Brant has a minimum of 40 r&j per ha; and 15% Intensification rate.</p> <p>Through the County's draft New Official Plan, submitted to the Province August 2021 for review, we recommended an increase Density of 50 residents and Jobs per ha; and an Intensification Target of 20% in our urban settlement areas of Paris and St. George.</p> <p>The P.P.S. does not prescribe minimum density targets for Ontario municipalities but does require municipalities to establish density targets for areas adjacent, or in proximity, to Major Transit and corridors.</p> <p>The P.P.S. also requires municipalities to establish residential intensification targets but does not prescribe minimum density targets for Ontario municipalities. Furthermore, the P.P.S. does not require municipalities to delineate built area boundaries in Official Plans.</p> <p>Under a consolidated Growth Plan and P.P.S., a standardized approach to minimum density requirements and residential intensification targets would be required for all Ontario municipalities.</p> <p>The County of Brant requests the removal of the Delineated Built Up Areas of Paris, St. George and Burford.</p>
<p>Rural Housing – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas.</p>	<ul style="list-style-type: none"> - The County supports permitting rural housing in rural settlement areas that are designated in Official Plans, and offers the following comments: <ul style="list-style-type: none"> - Where housing is created on private servicing, the quality and quantity of drinking water must be protected. In support of new development, a hydrogeological study should be required. To streamline this process, the Province should develop term of reference guidelines on the preparation of such studies. - To help protect the quality and quantity of groundwater and surface water in water resource systems, all key hydrologic features should be

	<p>protected with a vegetation protection zone should be required that is no less than 30 metres.</p> <ul style="list-style-type: none"> - To protect natural areas that are an important part of biodiversity and complete communities, it is recommended that development and site alteration not be permitted in key natural heritage features. Vegetation protection zones should be established to protect features based on specific features. - Public acquisition that provides for the permanent protection of natural areas should be encouraged as part of complete communities, as natural areas provide recreational opportunities that contribute to the mental and physical well-being of residents, while building resiliency to climate change. - The County of Brant supports limited rural housing in agricultural areas and offers the following comments: <ul style="list-style-type: none"> - Section 2.3.4.1 c) 2. of the PPS on surplus dwelling lots, appears to prohibit a residential dwelling on the retained farm parcel. The result of this policy is creating farmland where there is no housing for a farming operator and employees to live, while operating a farm. Housing should be permitted on all farmland to support agricultural operations. Housing could be located such that it would not fragment farmland near existing clusters of buildings, an existing laneway and/or by locating near the road or lot line. To prevent multiple severances and loss of farmland, surplus dwelling creation could be limited to one per farming lot. - New housing should not prevent agricultural operations from being able to expand. As such, new housing should only be permitted as infill development in an existing cluster of homes, where it would not result in further Minimum Distance Separation (MDS) restrictions. The Provincial MDS guidelines should be revised.
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	<ul style="list-style-type: none"> - Rural subdivisions should not be permitted outside of settlement areas. Any new housing should be limited to infill within an existing cluster of non-farm residential lots, such as between two existing non-farm residential lots. The depth should be limited from the road (e.g. 100 m deep), such as not to fragment farmland. See illustration:  <ul style="list-style-type: none"> - As with the above, it is important to ensure the protection of the quality and quantity of water, through hydrological studies, and policies that provide for the clear protection of water resource systems and natural heritage systems.
<p>Employment Land Area Conversions – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate.</p>	<p>An identified area of the Growth Plan and P.P.S. review is to provide policy direction to streamline and simplify the conversion of Employment Areas to new residential and mixed-use development, where appropriate.</p> <p>The County of Brant supports creating policies that would permit mixed-use development, where compatible, such as in areas that allow commercial and office type uses. In such instances, the first-storey should remain employment with residential uses being permitted above. Mixed-use development should be encouraged along arterial roads, and in urban growth centres, strategic growth areas, and downtown areas.</p> <p>Given the potential impacts of employment land conversions, standard criteria and principles should be developed at a provincial level to allow municipalities to evaluate proposals on a case by case basis, outside of a Municipal</p>

	Comprehensive Review, and determine whether a conversion is appropriate.
<p>Housing Mix – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs.</p>	<ul style="list-style-type: none"> - The County of Brant supports the creation of policies to provide a range and mix of housing options and densities to meet existing and future community needs, especially in the form of affordable housing, missing middle housing, and housing to meet demographic and employment-related needs. - It is suggested that clear definitions relating to both Affordable and Attainable housing be established to eliminate confusion on what it is intended when these terms are used in relation to housing. Too often these terms are used interchangeably despite having completely different meanings. We suggest that the current provincial definition of Affordable housing be maintained and remain based on household income not on market rates. Market rates fluctuate constantly and do not necessarily reflect nor support the most marginalized demographic of society, who are in the greatest need of affordable housing options. - Possible suggestion for Attainable housing definition: <ul style="list-style-type: none"> - Attainable Housing: A wider-spread equity of housing options, to allow for households to enter and graduate to successively higher levels of the local housing market, recognizing that housing prices have been growing faster than household incomes, creating opportunities for households who have been priced out of the market or are struggling with higher rents. - Consideration should be given to shifting emphasis from specific housing typologies to density, including unit size and count, to assist in providing a more flexible approach to provision of housing. Strict definitions and housing types within policy documents can be very restrictive and discouraging in achieving complete community housing options and creative solutions to housing needs. Removing these barriers would help ensure a range and mix of housing can be provided without the need for amendments and public process. Focus should be placed on developing relationships between municipal planners

	<p>who have a strong knowledge of community needs and developers to build creative housing solutions.</p> <ul style="list-style-type: none"> - We suggest including provincial minimum ratios to benchmark a mix and range of housing. Having density ratios for developments/redevelopments could help ensure a broader mix of housing is provided (not just singles and townhomes). Housing still seems to be largely segregated, with affordable housing here and high end there – whereas a true mix of affordability, density, and typologies within an area or building would help ensure communities are both complete and supported. More diverse areas, buildings, and communities (ranging in ages, densities, incomes, housing typologies, etc.) help provide important community supports (childcare, aging in place, etc.) throughout all stages of life. Diverse communities also help reduce social barriers and fears by creating a better understanding of different cultures, circumstances, and people. Policies which support updating ratios in relation to changing community needs would also be helpful to ensure an appropriate mix and range of housing options is provided. - Provision of housing that is affordable and accessible to low- and moderate-income households shall be a priority. Affordable housing definitions should be based on income, as opposed to market value which may fluctuate greatly and is often subjective. - Consideration should be given to including stronger policies relating to retaining existing affordable housing/units and rental housing/units to protect against deficits and assist in meeting community needs. Loss of affordable housing/units hinders the ability of municipalities to meet growing community needs, strategic housing goals, and provide housing options for all demographics. It is counter intuitive to establish affordable housing/units while at the same time allowing for existing affordable housing/units to be removed, often at a faster rate. Policies for the preservation of existing affordable housing/units and rental housing/units should be included to assist in provision of housing options, meeting community needs, and building complete communities.
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	<ul style="list-style-type: none"> - Ensuring all forms of housing (accessible, supportive, etc.) are encouraged and provided throughout all areas is integral to ensuring complete community function. Creating or retaining policies which discriminate against housing forms and types, either directly or indirectly, only contribute to the housing crisis and gaps in housing options. - Housing policies should be as flexible as possible to allow for implementation based on community needs and support (not just market rates or trends) and encourage all forms of housing to be integrated within existing and proposed developments. - Equitable housing options need to be encouraged and provided. Too often and especially in the case of affordable housing equity is an afterthought in the development, provision, or redevelopment of housing. Equity needs to be considered when choosing the location of affordable and attainable housing, designing size of units, proximity to amenities and community support, and community need (accessible, household size, etc.). Providing equitable housing for everyone is a significant piece of the housing puzzle and can help ensure a better quality of life for all. - In terms of density, it is recommended that densities within designated greenfield areas be increased to a minimum of 60 residents and jobs combined per hectares for areas with full municipal services. The current target of 40 is low, and will not result in a mix of housing types. - Creative interventions to provide additional housing supply in rural areas should also consider supporting rural amenities and how to overcome servicing limitations in rural settlements. In prime agricultural areas, housing policies should address farm succession, appropriate clustering, strict limitations, MDS priority and opportunities for shared / condominium ownership of a farm compound with multiple clustered residences. - The County looks forward to further government funding/granting to support development of housing options (affordable, additional, attainable, etc.) within
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	outer ring/rural municipalities experiencing continued population growth and migration.
<p>Major Transit Station Areas – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario.</p>	<ul style="list-style-type: none"> - Recognizing the benefits of locating/integrating housing and transit, the County of Brant supports policy direction to ensure Major Transit Station Areas meet minimum density targets to capitalize on investment, infrastructure, and promote transit supportive housing options. Integrating housing and transit where possible assists in mitigating climate change and helps to meet carbon neutral goals. - Consideration should be given to how growing municipalities can consider a similar policy application prior to the creation of larger scale transit systems. For example, as the County of Brant considers how to best connect its communities and the communities of the GGH area with transit opportunities, being able to invest in certain areas to create logical transit station areas over the next 30 years would be beneficial. - The County looks forward to further government funding/granting to support development of housing options (affordable, additional, attainable, etc.) within outer ring/rural municipalities experiencing continued population growth and migration.
<p>Urban Growth Centres – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur.</p>	<ul style="list-style-type: none"> - The County of Brant agrees that municipalities should be able to identify centres for urban growth as focal points for intensification, including mixed-use development.
<p>Intensification – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas.</p>	<ul style="list-style-type: none"> - Policy direction should be included that would increase housing supply in strategic areas, such as along major arterial roads and intersections, allowing for mixed-use in commercial corridors. - The County supports policies which allow for intensification within different areas (existing and new communities) to help increase housing options,

	encourage mixed use development, and integrate rather than segregate uses.
Large and Fast-growing Municipalities – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit.	<ul style="list-style-type: none"> - Provincial projects on roads, highways and transit should be integrated through official plans by designating lands where needed for future use. As part of the Provincial review process, it is recommended that the Province provide specific feedback for the County to integrate community planning with provincial projects. For example, requirements of the Ministry of Transportation could be added to official plans.
Agriculture – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations.	<ul style="list-style-type: none"> - Agriculture is an important part of the economy in the County of Brant. Feedback received as part of the official plan review and through development is that existing farms need to be able to expand without being hindered by non-farm residential lots. Currently, MDS is based on agricultural structures that exist, but does not take into account future expansion plans for farming operations. As such, any new residential dwelling could hinder future operations. The MDS formulae should be updated to give permit expansions of farming operations on any farmland within the agricultural land base. - As noted above, limited flexibility could be provided for new lots in areas that are already impacted by existing strip development. Creative interventions to provide additional housing should also be considered that consider farm succession, clustering, and opportunities for shared / condominium ownership of a farm compound with multiple clustered residences. - The County supports policies that would allow housing for farm workers on-site. - Maintaining policies which direct new residential development to established residential areas (within the rural and urban areas) would also assist in protecting agricultural areas from encroaching residential development.
Natural Heritage – streamlined policy direction that applies across	<ul style="list-style-type: none"> - Clear direction should be implemented on where development and site alteration may or may not be

<p>the province for Ontario's natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting/compensation</p> <p><u>(Proposed Updates to the Ontario Wetland Evaluation System)</u></p>	<p>permitted. The PPS has had long standing protection for provincially significant wetlands, which is a clear policy that results in protection of wetlands. However, the test of no negative impacts in the PPS is ambiguous, often resulting in removal of natural areas due to development pressure and differing opinions. An Environmental Impact Study often needs to be completed, which may require four season surveys, adding additional review time and delay to the process. There may be differing opinions on what constitutes a significant woodland and what would be considered a negative impact, as the direction is not clear. Determining significant wildlife habitat is a complex process requiring specialized expertise and delays in the process.</p> <ul style="list-style-type: none"> - In contrast, outside of the settlement areas A Place to Grow provides stronger direction, in that no development is permitted in key hydrologic features (e.g. any wetland regardless of significance, permanent streams, intermittent streams). At a minimum a 30 metre vegetation protection zone is required. In addition, development is not permitted in key natural heritage features where they are part of the Natural Heritage System for the Growth Plan. Provincial mapping of the Natural Heritage System when it was in place clearly identified areas where the policies applied. However, when the Growth Plan changed the mapping to natural heritage systems identified in an official plan, applicants have argued that woodlands not specifically called a 'natural heritage system' did not need to be protected. When policies create ambiguity, it is difficult to protect important natural areas, resulting in significant staff resources to defend terminology in policies and ultimately delaying approval of new homes. - Similar to the Growth Plan, Greenbelt Plan, Niagara Escarpment Plan and Oak Ridges Moraine Conservation Plan policies should be provided that do not permit development in and/or adjacent to key natural heritage and hydrologic features. The Province should identify and map core areas and linkages to be protected within and outside of settlement areas. Having policies and mapping that are easy to interpret would streamline the development process, by avoiding contentious debates
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	<p>on environmental protection and directing housing to more suitable locations.</p> <ul style="list-style-type: none"> - While stronger protection for natural areas has typically been afforded to features outside of settlement areas, it is imperative to protect natural areas in settlement areas. Public access to nature contributes to the physical and mental well-being of communities while mitigating for climate change. Many settlement areas have lost the majority of natural areas, degrading the quality of life for residents and resulting in significant costs for infrastructure due to environmental damage. - The Province should set science based targets for natural area coverage for features such as wetlands, woodlands and grasslands. Environment Canada's 'How Much Habitat is Enough' recommends that a municipality have 30% to 50% forest cover, and that streams have a minimum naturally vegetated buffer of 30 metres on each side. - The new policy should incorporate minimum standards and targets. Protection should focus on protecting natural heritage systems and water resources systems. Environmental offsetting should only be considered outside of core areas and linkages and/or where a municipality is above science based targets. For example, if a municipality has less than 30% forest cover, all significant woodlands should be protected. - Direction on provincial and federal requirements should include the <i>Migratory Birds Convention Act</i>. This is federal legislation, which may have requirements beyond the PPS and <i>Endangered Species Act</i>. For example, there are 18 species that are protected all year long. To ensure that development and site alteration will not contravene this legislation, it should be added to provincial policy.
<p>Natural and human-made hazards - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk.</p>	<ul style="list-style-type: none"> - Legislation and regulations in the <i>Planning Act</i> and <i>Conservation Authorities Act</i> should be consistent to avoid confusion on what may or may not be permitted, resulting in a more efficient review process. - The way policies in the PPS is worded, is somewhat confusing. Section 3.1.1 states that development shall 'generally' be directed outside of..., while Section 3.1.2

	<p>states that development and site alteration shall not be permitted in...</p> <ul style="list-style-type: none"> - Clear direction should be provided on when development and site alteration must be directed outside of hazardous areas. For example, new development should not be permitted within and/or adjacent to steep slopes. - Requiring minimum setbacks from the top of valley that includes an emergency access allowance of at least 6 metres, would streamline the process by providing obvious direction. As an example, some conservation authorities have set minimum setbacks of 15 metres for major valleys and 7.5 metres for minor valleys, from the top of a slope; having specific setbacks results in clear direction and a more efficient approval process while protecting natural hazards and natural areas. - While the policies do not permit development and site alteration in a floodway, the reality is, is that many conservation authorities permit site alteration and minor development such as in the form of additions, which seems contrary to this policy. Direction should be provided on when minor development could be considered. - The County has a Special Policy Area (SPA) that was created in 1987. The terminology and policies are out of date. The definition of development is very vague, and as such there are not many restrictions on density, potentially increasing risks to more lives. The policy prohibits new residential units above existing commercial, however a new residential building could be built where there was no prior commercial use. We have had businesses request to build new residential units above store fronts, which would provide income opportunities in addition to housing. However, the PPS requires any updates to a SPA to be approved by the Province, which is an expensive and lengthy process requiring technical studies without any guarantee of approvals. The County should not have to undertake such studies, if we are simply updating definitions or proposing development no greater than what would be permitted by the 1987 policies. In attempting to update the policies through the municipal comprehensive review, the County
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	<p>has received major opposition from the Ministry of Natural Resources and Forestry and the conservation authority. For example, the County wanted to permit mixed-use development up to three storeys, which will not be considered unless complex studies are completed. The County recommends updating SPA policies to create a simplified process for updating outdated policies.</p>
<p>Aggregates – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed.</p>	<ul style="list-style-type: none"> - The County recognizes that aggregates are an important part of building homes and associated infrastructure. - Concerns of the County relate to allowing below water extraction, as it hinders future ability to return lands to prime agricultural use. Consideration should be given to not permitting below water extraction in prime agricultural areas. Further consideration should be given to directing aggregates outside of serviced areas, such as to make the best use of municipally serviced lands for housing. - Another common concern for aggregates is building too close to existing residential areas. Typically, only a 30 metre setback is provided between operations and existing residential development, which appears to be based on Provincial Standards. The County recommends establishing minimum setbacks from existing residential subdivisions, which would streamline the process by addressing a contentious issue.
<p>Cultural heritage – policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply (<u>Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 (Schedule 6) - the Proposed More Homes Built Faster Act, 2022</u>)</p>	<ul style="list-style-type: none"> - The <i>Planning Act</i> and <i>Ontario Heritage Act</i> should be consistent to avoid confusion and provide for easy interpretation. - Policy direction must be flexible to support varying levels of available resources at municipalities. Cultural heritage, both tangible and intangible, is an important aspect of the character-defining elements of complete communities. - Improved directions should include: <ul style="list-style-type: none"> o An efficient and clear inventory and identification process that offers various levels of protection, prioritization, and appropriate timelines for evaluation to be completed. This evaluation should balance individual objectives (monies

	<p>made from re-development) with community objectives (character defining elements). There should also be a clear funding mechanism and resources for this inventory process to be applied in municipalities with varying levels of resources.</p> <ul style="list-style-type: none"> ○ Broad application that protects resource clusters in built-up areas that are seeing development pressures but is easier to implement than a Heritage Conservation District. These areas could be identified in an Official Plan as areas of potential cultural heritage value where conservation values and strategies are applied specifically (to certain resource types) or broadly (across multiple areas). This could be implemented through zoning or the community planning permit system and should incentivize the municipality's preferred interventions, fast tracking developments that meet the general conservation objectives. Ideally, the process would provide opportunities to identify and evaluate resources and offering clear protection to certain types of resources based on the identified Provincial and municipal priorities. The implementation of these policies must find a better balance between (re)development desires and the desire to conserve cultural heritage value. Consider additional resources / templates for implementation, flexibility, and pro-active evaluation opportunities. ○ Conservation opportunities that clearly integrate the renovation and repair of existing buildings, including incentivization through taxes and reduced fees. Consider how to incentivize developments that adapt, reuse, and convert existing building stock. Data from the Canadian Home Builder's Association shows that home renovations in Canada generate more financial investment and jobs annually than new construction. One of the main concerns expressed by the public is the importance of protecting the unique architectural design associated with existing heritage buildings, particularly in
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	<p>downtown areas and rural settlement areas. In essence, communities want to be able to manage their change (not prohibit, just manage).</p> <ul style="list-style-type: none"> - It is the interpretation of the County that the recent changes to the Ontario Heritage Act through Bill 23 continue to apply a one-size fits all approach to heritage conservation. This fails to account for needs and desires of individual communities that have engaged with stakeholders to determine local objectives and does not allow municipalities enough flexibility to create locally based solutions. More specifically, - The criteria for designation have been made more difficult with Bill 23 <ul style="list-style-type: none"> o Requiring a property to meet two of the legislated criteria for designation, instead of one, will make it challenging to protect humble smalltown buildings/ reflect rural life and places associated with the historic contributions of Black, Indigenous, multicultural, and 2SLGBTQIA+ communities (who may have less recorded/ preserved archival materials). - The changes do not acknowledge how consideration for heritage is changing <ul style="list-style-type: none"> o From when the Heritage Act first appeared to today the idea of what might be considered heritage has expanded. No longer is it simply significant landmark buildings. - The <i>Ontario Heritage Act</i> and Bill 23 overly simplifies Ontario heritage, which it should not do. <ul style="list-style-type: none"> o We need to consider Indigenous Reconciliation, new immigrant communities and the diversity of our communities. We cannot speak to Ontario heritage without respecting the diversity that exists in our culture, and the need for dialogue on heritage values. - The recent changes to the listing process for non-designated properties on the heritage register has created a level of redundancy that does not support heritage conservation efforts. <ul style="list-style-type: none"> o It requires much effort that affords very little protection and as a small municipality, we need opportunities for simple implementations that offer better results. Alteration is not prohibited, demolition requests are timed, resources for
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	<p>inventorying are limited, the ability to be reactive is limited, and the system prioritizes individual desires (often rooted in economic gain) at the cost of community character objectives. The County of Brant supports heritage conservation tools that allow a municipality the flexibility to set up a clear but simple control system to address and balance the desires noted above.</p> <ul style="list-style-type: none"> ○ If heritage properties are not properly protected in the County this will be a lead to a substantial loss of character, loss of unique identity, and therefore damage to tourism economy. - Much of the heritage work done in smaller municipalities is done by volunteers and these new updates could be discouraging to the volunteer base. The feel more restrictive and less like the community can make a difference in their local heritage preservation. Finding a balance between opportunities to conserve heritage / community character (various options to protect, preserve, rehabilitate and restore older buildings) and promoting healthy change will be key. In the words of Jane Jacobs, “new ideas need old buildings”.
<p>Infrastructure Supply and Capacity – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning.</p>	<ul style="list-style-type: none"> - While municipalities must be responsible for long range planning of infrastructure to accommodate planned growth, ensuring Development Charges are collected (development pays for development) is an essential component in the provision of municipal infrastructure (ex. water, wastewater).
<p>School Capacity – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education’s proposal to support the development of an urban schools’ framework for rapidly growing areas.</p>	<ul style="list-style-type: none"> - The County supports policy direction that ensures school facilities form part of the community planning process at the municipal level to help meet community needs and support growing communities. - Identifying sites to accommodate school facilities early in the community planning process is essential to ensuring complete community design and community support. Locating school facilities within safe walking distance of planned communities also assists in alleviating traffic, parking, and transportation issues.

	<ul style="list-style-type: none"> - Integrating other community supportive uses (ex. childcare services) on the same site or in close proximity to school facilities where appropriate also assists in complete community design and support.
<p>Outcomes-Focused – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes.</p>	<ul style="list-style-type: none"> - In terms of the natural environment, more prescriptive policy direction could significantly streamline the process. Less studies would be required if clear mapping and policies were provided that prevents development in natural heritage and water resource features, areas, and systems. Setting required vegetation protection zones could reduce the need for studies on adjacent lands. - Where studies are required, the Province could assist in developing templates or guidelines for Terms of References, such that there are the same standards throughout the Province. In many instances, consultants must adjust to differing requirements of municipalities. Provincial standards would expedite the process for rural municipalities that do not have staff to prepare such guidelines.
<p>Relevance – streamlined policy direction that focuses on the above-noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests.</p>	<ul style="list-style-type: none"> - The County agrees that clear and streamlined policy direction is needed to reflect provincial interests and meet community needs. - For example, in creating complete communities with a mix of uses, minimum ratios or targets could be established for affordable housing, different housing typologies, green space, schools, and supportive nearby commercial uses. These would help ensure complete community design.
<p>Speed and Flexibility – policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier.</p>	<ul style="list-style-type: none"> - Updates to policy need to be simplified. While it is important to update provincial policy to be in line with emerging trends and issues, it is difficult for municipalities to be constantly updating documents such as official plans, zoning by-laws, site plan control by-laws and parkland dedication by-laws. Templates at the provincial level would assist when new changes are introduced. For example, when additional residential units were first permitted, developing official plan and zoning by-law templates for policies may have assisted municipalities in updating their planning documents. This

would be especially helpful for as of right policy provisions.

Question 2

What land use planning policies should the government use to increase the supply of housing?

- The County supports core elements related to flexible housing policies (ex. housing within different areas and in creative forms) and employment conversions in commercial areas that would allow mixed-use development. In addition, creating policies that require higher density within strategic growth areas, along major arterial roads and intersections would assist. Similar to allowing three units per lot, as of right permissions could be created in certain areas. Policies that require greyfield and brownfield development, prior to considering settlement boundary expansions, should be considered.
- Policies should require that new developments, particularly in greenfield areas, be built to accommodate additional residential units (two to three residential units per property). In Surrey, British Columbia, many new homes are built such they can easily be converted to two to three units. For example, they have exterior stairs that go to a basement suite and/or garages that can accommodate a unit above the garage. There is also similar legislative changes which have been enacted in New Zealand within the past year to assist in providing more housing options as of right. In contrast, many homes in Ontario would require expensive renovations to add additional residential units (ex. install separate access), and in many cases would not be able to accommodate additional units (either internal or external) due to the size of the lot, which already struggle to accommodate air conditioners, parking, and proper grading and drainage. Creating policies that change the way new subdivisions are designed is one of the simplest ways to increase housing options in greenfield areas.
- Implementing a simplified process to address outdated floodplain Special Policy Areas would assist in creating limited housing options above commercial uses in downtown areas (ex. downtown Paris Ontario). Increased housing options within downtown areas would also assist in creating complete communities by contributing to walkability, live/work opportunities, and sense of place.

Question 3

How should the government further streamline land use planning policy to increase the supply of housing?

- In addition to the integration of the PPS and Growth Plan, the government could consider integrating an official plan with a zoning by-law or the community planning permit system, such that there is only one planning document at the municipal level. Multiple levels of land use planning policies increase confusion, review time, complexity in interpretation, and planning applications. For example, a person may need to amend an official plan and zoning by-law for a proposal to increase housing options, which creates duplication in process, review, costs, and

time, often affecting feasibility of the project, either resulting in the project not being constructed or priced at an extremely high rate for the potential owner or occupant.

- The Niagara Escarpment Commission has a simple planning process, which is based on the Niagara Escarpment Plan and a Development Permit System. The plan has objectives, criteria for determining designations, policies and development criteria. Through the Development Permit process, development is reviewed on meeting the general intent of the plan, as opposed to being focused on specific setbacks in a zoning by-law. A site plan for development is submitted which is reviewed in context of the Plan. It is similar to the Community Planning Permit System, however, only requires one land use planning policy document instead of two.
- Provincial mapping of strategic growth areas, with municipal input, could assist in identifying areas where mixed-use intensification could occur and should be encouraged.
- Provincial mapping and policies, inside and outside of settlement areas, that provide for the permanent protection of a natural heritage system and water resources system including natural hazards would provide clear direction on where development is not permitted and where it may be considered. By establishing where development may not be permitted, development efforts could be focused on revitalizing underutilized land.

Question 4

What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new document?

- Minimum density targets have assisted with increasing density in greenfield areas. Where specific targets are provided, it is easy to implement policy, and targets are often achieved. However, as recommended above density targets should be increased to help achieve a mix and range of housing options to address community needs.
- Strong settlement area boundaries and built-up areas are important in the balance between greenfield development and intensification as well as the protection of other resources (natural, agricultural etc.). Density is an important aspect of the provision of sufficient housing supply and the creation of complete communities and transport network options and relies heavily on limiting the ability to grow out.

Question 5

What policy concepts in the Provincial Policy Statement and a Place to Grow should be streamlined or not included in the new policy document?

- Sections 2.15 and 2.18 of the PPS that do not permit development in and/or adjacent to specified natural heritage features unless it is demonstrated that there are no negative impacts, should be re-written. Clearer policies, such as that from Sections 4.2.2, 4.2.3, and 4.2.4 in the Growth Plan should be used, inside and outside of settlement areas.

- Similarly, Section 2.2 of the PPS on Water includes vague policies on improving the quality and quantity of water. Minimum criteria should be provided such as requiring the protection of key hydrologic features with specified vegetation protection zones.
- A Place to Grow and the PPS focus on watershed and subwatershed planning, which is a long complex process that results in delays in building homes. One of the issues is, is that small municipalities do not have expertise to undertake and implement watershed and subwatershed planning. To speed up housing and protect the environment, greater assistance from the Provincial level is needed in terms of creating clearer policies and/or providing experts to lead watershed and subwatershed planning. The County recommends that conservation authorities lead the process as they are watershed based and could rely on monitoring data undertaken by the conservation authority.
- Consider integrating clear heritage conservation policies from the OHA into the new policy document in a way that prioritizes the protection of cultural heritage resources, honours existing community character, and incentivizes renovations and adaptive reuse that improves housing supply and mixes uses in existing neighbourhoods.
- Section 2.2.6 Housing of A Place to Grow provides strong direction to municipalities for inclusion of a range and mix of housing. Section 2.2.6.5 should be revised to include stronger language for inclusion of affordable and attainable housing options (as defined) when settlement areas are expanded to accommodate development within the Greenfield Areas.
- Section 2.2.7.1 should be revised to require new development within designated greenfield areas to include affordable and attainable housing (by definition) based on current and projected community needs. There could also be language included to have the developer build/provide these forms of housing/units or land to the municipality or monetary contribution to support future housing builds within the community.
- With changes to DCs through Bill 23 which will negative impact municipal affordable housing projects inclusion of policies to require mandatory provision of affordable and attainable housing/units by developers (either through developer led builds, land donation, or monetary contributions) within provincial land use planning documents would be extremely helpful.
- Section 7 Definitions “Affordable” this terminology should remain unchanged and based on annual household income not market rates. Additionally, it is suggested that a defined term for “Attainable” in relation to housing should be added to provide clear intent of what is meant when this term is used and avoid confusion in relation to Affordable and Attainable housing which are often used interchangeably, despite having two very different meanings. Section 6 Definitions of the PPS could be merged with Section 7 of A Place to Grow.
- Sections 1.1.3.6, 1.1.3.7, 1.1.3.9, 1.1.4, and 1.1.5 should be revised to include affordable and attainable housing (as defined) as part of new development within designated growth areas and targets to meet projected needs.
- Section 1.3 Employment and 1.3.2 Employment Areas may need to be revised to include clarification on mixed uses encouraged within these areas, pending proposed changes to allow residential uses within employment areas where appropriate.

- Section 1.4 Housing needs to be revised to provide direction for the mandatory inclusion of affordable and attainable housing (by definition) within new development and redevelopment to assist in meeting current and projected community needs.
- Suggested inclusion of wording to prioritize affordable and attainable housing within a new integrated provincial policy document and provide special consideration for the relief of parking and regulatory development standards (similar to the provincial approach with ARUs through Bill 23) where appropriate.