



June 22, 2023

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Dear Minister Clark:

Thank you for the opportunity to comment on ERO 019-6813 – “Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument”.

Tay Valley Township Council and residents have watched the provincial government’s changes to land use planning and environmental legislation with growing concern. The provisions in Bill 23 that curtail the operations of the Conservation Authorities, remove protection for candidate Provincially Significant Wetlands, and remove funding for Development Charge studies, etc. harm Tay Valley Township as a rural township with an abundance of natural features and water bodies and little commercial development.

The 2023 Provincial Planning Statement (2023 PPS) presents some opportunities for our community but overall presents a great many more challenges. Tay Valley Township Council does support the retention of policies on:

- climate change mitigation and adaptation;
- natural hazards and human made hazards;
- low impact development, watershed planning, and water resource systems.

However, the Township is concerned about the narrowed focus in the 2023 PPS on policies related to housing and infrastructure and the removal of comprehensive planning. Specific areas of concern include:

- loss of rural landscape;
- negative impacts on climate change and biodiversity;
- reversal of affordable housing.

The 2023 PPS removes language about the protection of the rural landscape and removes the requirement for studies for settlement area creation/expansion. These two proposals have the potential to allow sprawl (low density, inefficient residential development) to encroach throughout our Township.

Tay Valley contains the western edge of the Frontenac Biosphere Reserve and the eastern edge of the Land Between ecosystem. It also contains the edges of the northern and southern ecoregions in the province. The Township land use is approximately 70% rural and a little under 30% agricultural. Therefore, it is easy to see how sprawl inducing policies would destroy the natural heritage features and rural landscape of the Township.

The Township would like to see language included in the Draft 2023 PPS requiring new settlement area designation and settlement expansion to demonstrate financial sustainability of infrastructure costs, avoid leapfrog development, and protect other provincial interests.

The 2023 PPS will undermine the ability of the Township to achieve its Climate Action Plan goals. Without transit, sprawl development releases more greenhouse gases into the air. On the flip side, with the removal of the Ministry of Natural Resources in identifying Provincially Significant Wetlands, the Township will have to delineate these valuable carbon sequestering, flood and drought mitigating natural assets itself.

Replacing the 2020 PPS goal of affordable housing (rental or home ownership that costs no more than 30% of a person's income) with encouragement to provide a range of housing options is a step backward for our residents. The province's definition of attainable housing as 80% of market prices is out of reach for more than half of residents in Lanark County according to a study conducted in 2022 by WSP.

The Township would like to see more provincial funding for co-op housing and housing that is net zero to provide truly affordable housing options.

The Township also has concerns that the 2023 PPS still contains the provisions for multiple dwellings on multiple lots on agricultural lands despite the update June 6, 2023, on Natural Heritage. The Township agrees with Ontario farming organizations that prime agricultural land is not the place for multiple severances and dwellings.

Finally, the Township foresees that the 2023 PPS will increase costs to the Township for meaningful consultation with Indigenous groups; watershed planning, delineation of Provincially Significant Wetlands, infrastructure associated with inefficient land use, etc.

Sincerely,



Rob Rainer, Reeve

Attachments: Report PD 2023-11 and Council resolution

c.c. Hon. Graydon Smith, Minister, Ministry of Natural Resources  
Hon. John Jordan, Member of Provincial Parliament, Lanark-Frontenac-Kingston  
Mayor Robin Jones, Chair, Rural Ontario Municipal Association