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# HALDIMAND COUNTY

## Report PDD-15-2023 Information Report Relating to Proposed Planning Legislation Changes

For Consideration by Council in Committee on May 23, 2023

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### OBJECTIVE:

To present an overview of proposed changes to the *Planning Act* and Provincial Policy Statement as introduced by the Provincial government.

### RECOMMENDATIONS:

1. THAT Report PDD-15-2023 Information Report Relating to Proposed Planning Legislation Changes be received;
2. AND THAT Planning and Development staff be directed to submit Report PDD-15-2023 as the County's comments to the Province's Environmental Registry through posting #019-6813.

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**Approved:** Cathy Case, Acting Chief Administrative Officer

### EXECUTIVE SUMMARY:

To provide Council a summary of the proposed Provincial Planning Statement, which would combine the current Provincial Policy Statement and the Provincial Growth Plan, and Bill 97, *Helping Homebuyers, Protecting Tenants Act*. The Province has released a draft copy of the Provincial Planning Statement on the Environmental Registry of Ontario (ERO) for review and comment. The stated intent of the documents is to enable municipalities to accelerate the development of housing and increase housing supply through a more streamlined province-wide planning policy framework. Staff have a number of concerns related to the significant policy changes, shifting control and power and impacts to public interest. It is recommended that report PDD-15-2023 be submitted through the Environmental Registry of Ontario (ERO) as the County's comments on the proposed Provincial Planning Statement.

### BACKGROUND:

There have been a number of changes through 2022 and into 2023 to various pieces of Provincial legislation that impact the planning and development process in Ontario and for Haldimand County. Those changes have been introduced through multiple legislative bills, as follows:

- i. Bill 109 – *More Homes for Everyone Act, 2022*
  - First Reading: March 30, 2022
  - Royal Assent: April 14, 2022
- ii. Bill 23 – *More Homes Built Faster Act, 2022*
  - First Reading: October 25, 2022

- Royal Assent: November 28, 2022
- iii. Bill 27 – *Protecting Agricultural Land Act, 2022*
  - First Reading: October 27, 2022
  - Royal Assent: Pending

Most recently, on April 6, 2023, the Province released a proposed draft of a new Provincial Planning Statement – this would combine the Provincial Policy Statement and A Place to Grow legislation (the ‘Growth Plan’) to form a new provincial planning policy instrument. The noted intention of the new Provincial Planning Statement is to simplify the planning framework, provide flexibility for municipalities and facilitate a housing focused policy framework. Additionally, along with the new Provincial Planning Statement, the Province also tabled Bill 97 – *Helping Homebuyers, Protecting Tenants Act, 2023*, which received its second reading (Consideration of a Bill) – April 26, 2023. Bill 97 proposes minor changes to various acts including the *Planning Act*, *Development Charges Act* and the *Ministry of Municipal Affairs Act*. The changes are to align with previous amendments to the *Planning Act* (those made through Bills 23 and 109) and also to support the proposed Provincial Planning Statement. At their core, these two initiatives are aimed at supporting the Province’s Housing Supply Action Plan that targets the construction of 1.5 million homes by 2031.

The proposed Provincial Policy Statement (Statement) is presently in its draft form and has been posted on the Environmental Registry of Ontario (ERO) for a 60-day review and commenting period until June 5<sup>th</sup>, 2023. While there are some positive aspects to these proposed changes, there are a number of significant concerns that staff have identified should the new Statement be enacted as proposed. Those concerns, which include shifting controls and powers, diminished public interest matters and watered-down policy frameworks, are described in detail in the Analysis section below.

## ANALYSIS:

The following analysis will identify some of the key changes of the proposed Provincial Planning Statement and potential benefits or implications to the municipality as well as the changes coming via Bill 97. On the whole, the changes being introduced are very concerning to staff. Many of these changes will fundamentally alter planning policies and municipal growth and development.

### *Provincial Planning Statement*

#### 1. Housing

There are a number of changes included within the draft document that relate specifically to housing policies, which have been highlighted below.

Proposed Change	Comment
A new Schedule and set of policies have been developed to cover the 29 largest/fastest growing municipalities in the Province. These municipalities – mostly GTA based and not including Haldimand – will be required to plan for a revised density target of 50 residents and jobs per hectare (lowered from 80). The rest of the Province, including Haldimand, will no	Haldimand is not included in the list of 29 municipalities identified as ‘Large and Fast Municipalities’. Haldimand County has been subject to density targets since the initial Growth Plan in 2009. Most recently, as part of the Official Plan (OP) Update Phase 1, the County was able to establish ‘locally appropriate’ targets as permitted under Provincial policy. This is due to the fact the County is situated on the ‘Outer Ring’ of the Growth Plan area which is an area that already has policy flexibility relative to greenfield density. The County targets – approved at 40 residents and jobs per hectare – have been set based upon public and stakeholder consultation through the recent OP update process and represent an appropriate and achievable density for the County. In effect, the changes proposed now by the

Proposed Change	Comment
longer have a prescribed density target and will set their own.	Province will reflect the flexibility for a larger part of the Province that is already afforded to the County as an 'Outer Ring' municipality.
Removes mandatory intensification targets for all municipalities;	<p>Haldimand County has been subject to intensification targets within the Provincial Growth Plan since 2009. The County is required (under current OP policy) to ensure 20% of all new residential units are constructed within existing built-up areas. Intensification ensures an efficient use of land, supports a mix of housing options, facilitates smart use of existing infrastructure and helps to limit the pressure on prematurely expanding urban areas into agricultural areas. Removal of the targets would eliminate the requirement for municipalities to prioritize infill development and make it more difficult to promote (and possibly require) intensification in urban areas. It could result in potential for less dense development proposals and lead to larger urban lots. This could also result in additional lands being required to accommodate the projected population targets, thus putting pressure on urban boundary expansion, which in turn, could mean the loss of additional farm land.</p>
Provides for greater permissions for residential intensification;	<p>The proposed change would allow for additional opportunities for residential intensification, including the conversion of existing commercial and institutional buildings to residential uses; new housing options within existing or previously developed areas (i.e. townhouses or apartments in existing residential neighbourhoods); and redevelopment that results in additional residential units. The changes, combined with the removal of policy that directed "where this {intensification} can be accommodated", opens up the potential location of residential development and removes some of the overall protections for efficient and effective use of land and land use compatibility.</p> <p>While staff are generally supportive of the intent of these changes, there is concern in allowing conversion of commercial space in downtown areas – i.e. ground floor commercial space on a downtown main street. The viability and vitality of the County's downtown areas is dependent upon a vibrant and active commercial streetscape. The County has put significant financial supports into the downtown commercial areas over the last 10+ years (CIP grants, Streetscaping enhancements) and it is critical to ensure these investments are not negatively impacted. Staff are of the view that protectionist policy is still required for downtown commercial spaces.</p>
Expands the definition for housing options;	<p>The change to the definition would include laneway housing, garden suites, rooming housings and refines multi-residential to include low and mid-rise apartments. Additionally, it would also include multi-generational housing, farm working housing, culturally appropriate housing, supportive, community and transitional housing and educational and long-term care homes.</p> <p>This change could see an increase in a variety of housing forms as of right within the County and greater intensification with the broader</p>

Proposed Change	Comment
	arrangement of housing types and forms. This could see a shift in the traditional residential neighbourhood form and appearance. Generally speaking, this is a positive change as it does address the need for more housing options which is part of the affordable housing solution. What is critical, however, is for local autonomy to establish policies in municipal Official Plans that identify areas suitable/most able to accommodate these more dense and alternative forms of housing. This appears to be missing in the Province's proposal.
Removes the definition and reference for 'affordable housing'.	The term "affordable housing" would be removed from the Provincial Planning Statement and would rely on the municipality to define and consider either with a Development Charges definition or zoning. Haldimand would need to complete an analysis on what the average resale and purchase price for housing or the average market rent to determine rates for the municipality. This represents a significant shift away from the generally accepted affordable housing definition (i.e. that which is tied to income) and could drive County policy further away from a true measure of affordability. This could hamper municipal efforts to produce (or require to be produced) housing that is truly affordable to large segments of the population. This change is effectively allowing the real estate market to dictate what is considered affordable, whereas it is income that should be driving the definition.

## 2. Settlement Areas and Settlement Area Boundary Expansions

The changes relating to settlement areas are directed to no longer having the requirement for a Municipal Comprehensive Review (typically done through the municipal Official Plan update process) and the reduction for criteria for new or expanding settlement areas. These changes combine to have a significant impact on the growth strategy for the municipality and for the works recently completed for the Haldimand County Official Plan update and growth forecast to 2051.

Proposed Change	Comment
Removes the requirement for municipal comprehensive review (MCR) and reduces criteria necessary to justify settlement expansion and new settlement areas.	<p>An MCR has been a requirement for settlement area expansions since 2005 and is typically completed as part of an Official Plan review every 5-years. The MCR is a defined study and process which requires consideration of several factors (i.e. servicing, population and employment forecasts, demand, impact on agriculture, natural feature impacts, etc.) prior to growing out into rural or agricultural areas. The draft Provincial Planning Statement removes all references to an MCR, which means that level of study will no longer be required prior to a settlement boundary expansion.</p> <p>In lieu of the MCR, the Province proposes a small series of less stringent criteria that the municipality would need to address when considering a settlement expansion. That limited set includes:</p> <ol style="list-style-type: none"> <li>That there is sufficient capacity in existing or planned infrastructure and public service facilities;</li> <li>The applicable lands do not comprise specialty crop areas;</li> </ol>

Proposed Change	Comment
	<p>iii. The new or expanded settlement area complies with the minimum distance separation formulae (representing setbacks from livestock facilities);</p> <p>iv. 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</p> <p>v. The new expanded settlement area provides for the phased progression of urban development.</p> <p>The result of removal of the MCR, and combined with the reduction in the criteria for settlement area expansions, is effectively easing up the requirements for boundary expansions. This easing up could result in additional Official Plan amendments by private developers and land speculation as well as potential impacts on municipal servicing strategies and agricultural land preservation. When this is looked at in combination with the elimination of intensification targets as described above, it poses the threat of significant expansion pressures that could lead to urban sprawl and land supply that far exceeds the actual needs of the municipality. Given that the test for new or expanding settlements will be conformity with Provincial policy, and the fact that the tests of that policy are very limited, it could be difficult for municipalities to refuse proposals. A level of autonomy, that could include the ability to set local criteria that goes beyond the Province's base level or to require a certain size of expansion/new settlement be considered only in connection with a larger process (OP update), is absolutely necessary.</p>

### 3. Employment

The changes would represent a shift in the employment policies and employment land protection. The policies appear to promote mix-use development where appropriate, however, does open up the opportunities for greater conversion of potential employment lands.

Proposed Change	Comment
Change in the definition of <i>Employment Area</i> .	<p>The definition is proposed to be scoped from its current version and will now only include industrial (manufacturing, research and development) and warehousing with ancillary retail and office. The new definition would exclude long permitted uses such as stand-alone commercial uses that are not associated with the primary employment, offices and institutional uses. This is a limiting change because currently the definition includes a wider range of uses (as noted) and the wording "Including, but not limited to". The effect of these, historically, has been they provide the municipality with some flexibility and discretion regarding the types of uses that can be included within an Official Plan for employment. The proposed amendment would remove this ability. It is also noted that when planning for employment lands outside of employment areas, municipalities cannot be more restrictive through local policies and the Official Plan. Staff do not support this change.</p>

Lessens the restrictions regarding the separation between employment areas and sensitive uses.	While some flexibility around this is supportable, an outright reduction that is absent of any analysis and formal justification could be problematic. Incompatible uses need to be protected one from the other, and the most appropriate way to accomplish this is through detailed studies and mitigation programs/measures.
Amends the policies and requirements for employment area conversions.	The new PPS is proposing to allow the removal of lands from an employment area to be converted to other uses without the requirements for a Municipal Comprehensive Review (MCR). This change has a similar effect as that described in the Settlement Areas section above in that applications for changes in these uses could be submitted at any time and would not have the benefit of a larger, more comprehensive analysis of the supply and needs for employment lands that is afforded through an MCR process. Municipalities would be able to consider employment land conversion where it can be demonstrated that there is need for the removal, the proposed uses will not have a negative impact on the area or overall viability and function of the employment area and there is sufficient or planned infrastructure. This represents a fairly 'lean' justification when compared to the current policy framework. Staff do acknowledge there could be benefits to this, in particular in those situations where employment lands are mis-cast, isolated and/or surrounded by incompatible uses – this new policy framework would provide flexibility to look at establishing more appropriate land uses in these cases. On the whole, staff have limited concerns with this new policy but believe a hybrid approach would be better – i.e. one where an MCR process is still required for more significant large scale land conversions, but smaller conversions or those that have unique circumstances (as described above – isolated, incompatible uses abutting), would not require such.
Removes the application of Provincially Significant Employment Zones.	This amendment will impact Haldimand as the Lake Erie Industrial Park is currently identified as a Provincially Significant Employment Zone (PSEZ). The identification as a PSEZ provides an additional layer of protection and security for larger industrial areas from potential conversions. The PSEZ is proposed to be replaced with some different policy protections for significant areas of employment (those are yet to be defined). It is unclear to staff at this point what is to be proposed by the Province and additional information is required before comments can be formulated.

#### 4. Agriculture

The agricultural amendments are significant and could have direct impacts to the agricultural land base within Haldimand County. From the protection of farmland perspective, there is impact from previously raised items in this report, including the settlement boundary expansion and elimination of intensification targets. Under the current PPS framework, the criteria notes that expansions needed to avoid prime agricultural lands or be located on lower priority lands. The draft changes look to open up the opportunities for expansion that no longer serve to protect and preserve those areas. Additionally, it eliminates alternative evaluations for mineral aggregate extraction rehabilitation. Both changes could impact the viability and availability of prime agricultural lands.

Additionally, the following changes are also noted:

Proposed Change	Comment
<p>Permits opportunities for residential lot creation.</p>	<p>The most significant change to the document would see the allowance of three (3) new residential lots from a parcel of land. The current PPS does not permit residential lot creation in the prime agricultural area, an absolute restriction that dates back to 2005. This would also be a major shift in planning policy and would see lot creation opportunities that have not been promoted or encouraged for over fifty (50) years. More specifically, residential lot creation has been discouraged since the Countryside Planning/Foodland Guidelines that were issued by the Province in the 1970's. The intention of the policies was for the protection of agricultural lands and minimizing potentially incompatible or sensitive uses from encroaching upon active agricultural operations. If the policies carry forward it could result in the creation of thousands of lots and lost farmland. Based on a query of agricultural lands, with a minimum size of 10 hectares (25 acres), there are 2,949 parcels within Haldimand County. If the proposed changes to the lot creation policies were to be put in place, there is the potential for 8,847 new non-farm residential lots.</p> <p>It is noted that through the County's Official Plan Update and Municipal Comprehensive Review, an assessment regarding rural residential land needs was completed, which included hamlet, resort residential and agricultural areas. Through the assessment it was identified that 572 new dwelling units were needed to accommodate the anticipated rural growth over the next 30 years to 2051. The assessment demonstrated there is already opportunity for 980 residential lots in the County's rural areas, with 245 existing building lots specifically in the agricultural area (with balance of lot potential being within hamlets and lakeshore nodes). Point being, there is already ample supply of lands – almost 2x what is forecasted – to meet growth needs.</p> <p>Haldimand County is a strong agricultural community and has always maintained strong agricultural policies for the protection of the valuable and finite resource. The addition of non-farm residential lots leads to the fragmentation of land; greater impacts from minimum distance setbacks (to livestock facilities); and potential for conflicts relating to noise, dust, odour and traffic movements.</p> <p>Additionally, with permitted non-farm residential lots in the agriculture area it reduces the housing development within existing settlement areas, where the County has made investments for infrastructure and services. It also increases the demands for rural services including snow plowing, road maintenance, garbage collection, emergency service and water services and education needs (i.e. bussing).</p> <p>It is noted that the lot creation policies, as drafted, would only apply to lots where "agriculture is the principal use of the existing lot or</p>

Proposed Change	Comment
	<p>parcel” and not to all lands within the agricultural area. This would mean that existing residential/non-agricultural lots (of various sizes) would not qualify for the lot creation opportunities.</p> <p>Planning staff feel that this area has the greatest concern for the municipality and for the future ability and protection of farmland. It would be staff’s recommendation that the Province specifically revisit this policy direction. It is also noted that the types of lots that would be created do not directly address the housing affordability crisis facing the Province. Rural lots are typically sold at a premium given the size, location (pristine setting) and limited supply. While the latter item – supply – could potentially see a significant bump which could impact to some degree on price, it is assumed the cost of these lots and that required to build upon them, would far exceed the level of affordability for those most impacted by the current crisis. Point being, it is not clear how this measure serves to meet the Province’s intent of building more affordable housing.</p> <p>It is also noted that Haldimand County cannot be more restrictive than the proposed PPS when it comes to the policy framework. Our Official Plan policies will have to permit the three (3) lots if that is what is approved by the Province.</p>
Inclusion of accessory residential units as permitted uses.	This change would embed the allowance for accessory residential units, or secondary residential suites within the planning policy framework. This is already an adopted practice in Haldimand, and a permission that is found in the County’s zoning by-law. This appears to be a housekeeping change and staff have no issues with this part of the Province’s proposal.

In addition to the foregoing, there are a number of unanswered questions that staff have raised regarding the proposed Provincial Planning Statement and draft policies. These need clarification from the Province such that the County can better understand the intent and impact:

- Can a municipality be more restrictive or establish specific policy frameworks for residential opportunities within commercial areas?
- Can a municipality be more restrictive or establish specific policy frameworks when assessing settlement boundary expansions?
- What is considered agriculture? How do you test for agriculture as the principal use?
- Clarification on what ‘adjacent’ means? What is considered ‘adjacent’ to a non-agricultural use? Does a non-agricultural use include vacant farmlands or a residential dwelling?
- Can a municipality apply locational criteria to new residential lot creation within the agricultural area? (i.e. co-locate to minimize land fragmentation) and/or restrict the lot size?
- What is the interpretation of 3 new residential lots within agricultural areas? Does this mean 3 new lots plus the existing retained parcel? Or 3 lots in total – 2 new parcels plus the existing retained parcel?
- Should Haldimand County revert back to specific designation for mineral aggregate resources and hazard lands? The Haldimand County Official Plan proposes to identify these two land uses as an overlay with underlying policies, i.e. agriculture, providing more specific policy direction – however, if lot creation is permitted as of right on agricultural lands, could this impact potential mineral aggregate extraction opportunities and setbacks?



- If no MCR is required, and settlement expansions can be considered via individual requests, how does this figure into the strategic growth plan for a municipality?

It is also noted that Natural Heritage is a key section of the current Provincial Policy Statement and Provincial Growth Plan, however, at this time the draft Provincial Planning Statement has noted that these policies are still under review and consideration by the Province. As such, there is nothing for staff to review and comment on at this time. However, it is important to note that staff, as part of the Official Plan Update Phase 2, retained and worked extensively with a consultant (NRSI Inc.) to develop a natural heritage system and feature classification system for the entire County. This work was significant, costly, included public and stakeholder meetings/input (including the 3 CAs, First Nations and environmental groups) and was done to comply with the current versions of the PPS and Growth Plan. To what extent any new policies will impact on this work is yet to be determined. Once the new policies are released for public comment, and if there are significant impacts for the County, staff will produce a subsequent report to Council.

A final concern of staff is the impact this will have on work recently completed on the County's Official Plan update (both Phases 1 and 2). In particular, staff note the following:

- Staff, along with various consultants, worked 3 years (2019 to 2022) on the 2 phases of the Official Plan – this work included countless staff hours dedicated to research, policy writing/review, public meetings, map preparation, data/statistical analysis, Ministry/stakeholder meetings, etc.
- Over \$300,000 has been spent on fees for the lead consultant, technical studies by sub-consultants and public meeting facilitator. This work has included: Natural Heritage System Study, Housing Master Plan, Agriculture Impact Analyses, Servicing Analyses (Caledonia, Dunnville), Floodplain Analysis, Population & Employment Forecasts and Land Needs Inventory, and Rural Residential Development Potential.

All of the above work was completed in an effort to update our Official Plan to respond to the policy framework in place – i.e. Provincial Policy Statement 2020 and Growth Plan 2019 – and to meet the Province's established conformity target of July 1, 2022 (i.e. the deadline to have our OP updated to align with the Province's policies). The County, with significant effort and expense, met that deadline. Now, the concern of staff is that considerable parts of the work completed – again, done at the Province's direction – are now threatened and may need to be revised or re-done. The policy changes proposed by the Province suggest there will need to be significant re-writes of parts of the new County OP, additional consultation, and further specialized consultant studies – all of which requires staff resources (staff are already fully committed to projects and some positions remain vacant) and additional funds that could be significant. How this all gets accommodated and accomplished is a significant concern for staff. This needs to be addressed by the Province in terms of supports (including financial) and/or extended period of conformity (e.g. to be done at time of the next 5-year update of the County's OP).

### *Bill 97*

Bill 97, *Helping Homebuyers, Protecting Tenants Act, 2023* proposes changes to the *Planning Act* and are minor and technical amendments. While the changes proposed with Bill 97 were introduced at the same time as the Provincial Planning Statement, the Environmental Registry of Ontario (ERO) commenting period for Bill 97 closed on May 6<sup>th</sup>, 2023.

Change	Comments
<p>Additional Minister powers, which would permit the minister to directly intervene on certain planning functions:</p> <ul style="list-style-type: none"> <li>• Impose restrictions, limits and conditions on the powers of municipalities to regulate the demolition and conversion of residential rental properties;</li> <li>• Prescribe requirements to be contained in by-laws;</li> <li>• Prescribe conditions that must be included as requirements to obtain permits;</li> <li>• Prescribe requirements the municipalities must impose on land owners.</li> </ul>	<p>The change under Bill 97 and the addition of powers to the Minister would essentially prohibit the municipality from enacting policies that are more restrictive than approved by the Province through a Minister's Zoning Order.</p> <p>Additionally, the powers would allow the Minister the ability to require an agreement with either a municipality or a land owner relating to potential development if the Minister feels that it is necessary for appropriate development of the lands. The agreements could go beyond the policy framework of the <i>Planning Act</i> or the <i>Development Charges Act</i>.</p> <p>The change also would allow the Minister to issue an Order (MZO) to permit uses in an area where an Official Plan does not – i.e. residential uses outside of an identified growth area. This could be done without municipal consent/request.</p>
<p>Bill 109 Fee Refund formally extended to July 1, 2023.</p>	<p>The fee refund was originally intended to be in place for January 1, 2023, however, a letter was issued by the Ministry noting that the date would be pushed back to July 1, 2023. However, it is noted that no additional context or information has been shared regarding the concerns raised about the processing and in particular how to address the following circumstances that may causes delays to the review process:</p> <ul style="list-style-type: none"> <li>• New information required as part of the review process;</li> <li>• No response or delayed response from Ministry review (i.e. MTO); or,</li> <li>• Delay or lack of response on behalf of the proponent to concerns raised through review.</li> </ul>
<p>Restores the right of appeal to the initial passing of an Interim Control By-law.</p>	<p>Bill 23 removed appeal rights for Interim Control By-laws and through Bill 97 this opportunity would be permitted again. The requirement to give notice of the adoption of an Interim Control By-law is 20 days.</p>
<p>Parking for Secondary Residential Units – limitations through Bill 23 that limits the ability of municipalities to requirement more than 1 parking space for secondary units. Bill 97 clarifies that municipalities can still require more than 1 space for the primary dwelling through an Official Plan or Zoning By-law.</p>	<p>This change engrains the parking requirements for secondary suites and clarifies that municipalities can still require additional parking for the primary dwelling. Haldimand County has existing provisions within the Zoning By-law which are in line with these requirements, and no changes are required at this time.</p>

Change	Comments
Site Plan Control for Developments of 10 or less residential units.	Bill 97 adds back the ability for a municipality to apply Site Plan Control for housing developments with 10 or less units when they are located within 120 metres of a shoreline or 300 metres of a railway (this was removed via Bill 23). This would provide opportunities where development is proposed within proximity to a shoreline or rail line for additional design considerations and review by a municipality. This addition back into municipal reviews could be beneficial for residential proposals along Lake Erie or Grand River, in particular from a flood management and storm water perspective.

Planning staff will continue to monitor the changes proposed through the proposed Provincial Planning Statement and provide updates to Council. Staff will review and assess potential changes needed to the Haldimand County Official Plan and provide draft amendments when required. Meanwhile, in order to meet the deadline for comments with respect to the proposed Provincial Policy Statement, staff recommends that report PDD-15-2023 be submitted through the Environmental Registry of Ontario (ERO) as the County's official comments.

## **FINANCIAL/LEGAL IMPLICATIONS:**

Given the lack of clarity on a number of the proposed amendments, as noted above, it is impossible to quantify the potential financial impacts to the County at this time.

As noted in the Analysis section, should the policy changes be enacted as proposed, there will be resources required to modify the approved Phase 1 OP and the adopted Phase 2 OP, including funds for consultants, in addition to the significant funds and time expended to date.

More concerning, is the potential impacts on servicing of future development and the infrastructure impacts of these proposed changes. These changes could significantly change planned, growth related infrastructure needs or impact the intended needs of existing infrastructure not previously contemplated. This could significantly impact the County's overall long-term financial plan. It is also difficult to understand the potential impacts on the ability to collect growth related infrastructure needs through Development Charges.

These proposed changes, along with previous Provincial legislative changes, continue to challenge the ability for growth to pay the costs for growth related infrastructure needs.

## **STAKEHOLDER IMPACTS:**

The proposed policy changes should be shared with stakeholders and key County committees including:

- Agricultural Advisory Committee
- Business Development and Planning Advisory Committee
- Committee of Adjustment

## **REPORT IMPACTS:**

Agreement: No

By-law: No

Budget Amendment: No

Policy: No

## **REFERENCES:**

1. Environmental Registry of Ontario (ERO # 019-6813): Review of proposed policies adapted from A  
Pace to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.  
<https://ero.ontario.ca/notice/019-6813>

## **ATTACHMENTS:**

None.