



May 23, 2023

**By Email: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)**  
Provincial Land Use Plans Branch  
13th Floor, 777 Bay St  
Toronto, ON  
M7A 2J3

## **RE: ERO Posting 019-6813**

Thank you for providing the opportunity for the County of Bruce to comment on ERO Posting 019-6813 on the proposed 2023 Provincial Planning Statement through the Environmental Registry.

Bruce County and our eight local municipalities are committed to supporting the province's goals to increase housing supply, bring more affordable housing to market and streamline the development process to get more homes built faster. Bruce County delivers planning services to our eight partner municipalities and delivers a range of housing services, including the construction of County owned/operated housing.

Throughout the recent changes to the Planning System, Bruce County and its partner municipalities have been advancing initiatives to increase the supply of affordable housing by updating planning documents and preparing a new County Official Plan. An Official Plan Amendment implementing Growth Management policies and new population projections into the Bruce County Official Plan was adopted in October 2022 and is before the Minister of Municipal Affairs for approval.

Bruce County delivers planning services to our eight partner municipalities and delivers a range of housing services, including the construction of County owned/operated housing.

This letter summarizes proposed policy changes to the 2023 Provincial Planning Statement (PPS), which is proposed to replace the currently in-effect 2020 Provincial Policy Statement. This letter outlines PPS policy changes that Bruce County and its partner municipalities see as beneficial and supporting the supply of affordable housing in the County. It also highlights areas of significant concern that will limit our ability to effectively plan for complete communities and protect natural and agricultural resources.

## Overview of Comments on the Proposed 2023 PPS:

### Agriculture:

- Agriculture is a pillar of the economy in Bruce County. The protection and support of the viability of the agricultural industry in Bruce County and across the province is central to the economic success of Ontario and the well-being of its residents.

Bruce County is concerned that the proposal to permit the introduction of 3 new residential lots on any farm parcel that existed as of January 1, 2023 will have significant impact on the viability of agriculture over the long term. Scattered rural residential lots will adversely affect farming in Bruce County and overall food security and food production for Ontario. The value of agricultural land for the growing of food in Ontario must be maintained in the 2023 Provincial Policy Statement. The changes proposed remove agricultural land protections that were first introduced in Ontario with the 1970 Countyside Planning/Foodland Guidelines. In a time where affordability of food is a crisis for many in the province, the proposal to remove farmland to accommodate housing which could be directed into settlement areas does not resolve the housing crisis and is not needed to help Ontario reach its goal of 1.5 million homes in the next 10 years. The creation of new residential lots in the Prime Agricultural Area, beyond surplus dwelling severances, is not supported by Bruce County Council.

- In Bruce County, staff estimate the full implementation of this policy could introduce nearly 15,000 residential lots and remove approximately 29,400 acres of Prime Agricultural land out of production if the policy change were to be implemented as proposed. The impact of introducing new residential lots into prime agricultural lands creates conditions that put agriculture under pressure, including:
  - Safety and trespass issues for farmers;
  - Increased neighbour complaints and a less predictable environment to make agricultural business investment decisions;
  - Introduces restrictions on livestock production through Minimum Distance impacts;
  - Increased traffic on narrow rural roads which are also used by farm equipment
- We understand the premise of these changes to be to provide housing for farm workers and for the next generation of farmers. 2021 OFA statistics for Bruce County report 1,946 farms, and 5,180 farm jobs. Dozens of dwellings surplus to agriculture are severed each year in Bruce County. Farms in Bruce County can already construct an additional residential unit, and construct temporary farm worker accommodation, within the existing farm building cluster. This provides opportunities to address specific housing needs. Mandating lot creation on agricultural land will further drive up the price of each parcel of agricultural land, not in relation to its agricultural potential, but in relation to its lot creation potential. The lot and dwelling supply on agricultural land that is proposed to be mandated through the new PPS far outweighs the need and will only increase the cost of farmland for the next generation of farmers.

## Settlement Area Boundary Expansions

- Municipal comprehensive reviews are proposed to be removed as a requirement for settlement area boundary expansions. The removal of the concept of a municipal comprehensive review is a significant change, as this type of review has been in place since the 2005 Provincial Policy Statement. Overall, the additional flexibility for municipalities to be able to consider settlement boundary changes at times outside of Official Plan Reviews is considered by Bruce County Council as a positive change. The ability to consider boundary expansions outside of the framework of population projections based on regional market areas will assist member municipalities and the County of Bruce in responding to the unique needs and demand for growth of each of our settlement areas that cannot be reflected through a regional market study.

Growth of settlement areas is a much-preferred solution to create options for housing supply when compared to the impacts of widely dispersed countryside development both in rural areas and prime agricultural areas.

- Tools such as affordability targets, intensification targets and density targets, which Bruce County municipalities have utilized in settlement areas to effectively manage growth, affordable housing and servicing, have been removed in the proposed 2023 PPS. The removal of these tools to manage growth within settlement boundaries present a challenge for municipalities to “right size” their settlement areas, plan for infrastructure investments, and encourage appropriate density. These tools should be extended to municipalities outside of the 29 large and fast-growing municipalities.
- The County of Bruce continues to encourage the province to recognize the importance of infrastructure to facilitate growth in settlement areas. The need for funding support for infrastructure to keep up with the demand for settlement area boundary expansions is critical for municipalities. The proposed policies in the PPS have the potential to put significant demands on municipal infrastructure such as sewage and water systems, roads, bridges and stormwater. Supportive provincial funding and streamlined approvals for replacement and new infrastructure is key to municipalities being able to accommodate forecasted growth.

## Rural Areas

- In Rural Areas, the removal of settlement areas as the focus of growth has the potential to undermine growth in the towns, villages and hamlets within Bruce County where municipalities have been focusing residential growth and investing in servicing and amenities. The proposal to remove the requirement to retain areas for new or expanding land uses that require separation from other uses is short-sighted. If residential development is allowed unchecked in all Rural Lands new uses like livestock facilities, aggregate extraction, forest product processing, and waste disposal sites will be harder to locate in the future. The County is supportive of limited residential growth in rural areas, provided there is a strong policy framework to direct large-scale residential development into serviced settlement areas.

## Natural Heritage

- The proposed Provincial Planning Statement released on April 6, 2023 did not include natural heritage policies. The County will provide comment on those policies when the opportunity arises.
- Protection of natural heritage features is important to the environmental health and character of Bruce County. Bruce County requests sufficient time be given for the County to consult with municipalities, stakeholders and indigenous communities prior to the end of the public commenting period for the ERO posting for Natural Heritage Changes.
- Protection of natural heritage features is important to the environmental health and character of Bruce County. Bruce County requests the proposed 2023 PPS not be implemented before consultation can be completed for the Natural Heritage policies. PPS changes have a corresponding impact on policies within the Bruce County Official Plan and Local Plans. Policies for Natural Heritage are inter-related with other policies and a comprehensive review of all the policy changes is required to ensure that policies can be implemented in an integrated manner.

## Indigenous Consultation

- Bruce County appreciates the recognition of the contribution of Indigenous communities' perspectives and traditional knowledge in the proposed 2023 PPS, including the direction to have meaningful early engagement and constructive co-operative relationships.

## Complete Communities

- Bruce County supports the provincial interest in creating complete communities. Recognizing the importance of growth management and its impacts on schools and childcare facilities is key to building complete communities. The addition of policies to encourage collaboration between schoolboards and planning authorities is welcomed, as is the clear need to extend the collaboration between provincial ministries, such as Municipal Affairs and Housing and the Ministry of Education to ensure there is alignment between the growth Ontario is planning for and the schools and childcare facilities needed to support growth and complete communities. Bruce County appreciates the recognition that the long-term prosperity and social well-being of Ontario depends on planning for complete communities for people of all ages, abilities and incomes.

The above comments outline our most significant areas of comment and concern from a Council perspective. Staff comments on detailed aspects of the proposed Provincial Planning Statement are detailed below.

## Detailed Policy Comments and Recommendations

### Section 2.1 Planning for People and Homes:

The reduced emphasis on intensification coupled with more flexibility for boundary growth may lead to increased infrastructure costs and long-term liabilities for municipalities if not carefully implemented.

The change in the timeframes for which municipalities are to plan for growth and infrastructure to a 25-year minimum may cause uncertainty and inequality in approach to population growth projections and infrastructure investment across municipalities.

### Section 2.2 Housing:

The current PPS directs planning authorities to establish and implement minimum targets for housing affordable to the lowest 60% of the income distribution of the area. In essence, policy intervention is required to support affordability for more than half of Ontario's households. As most municipalities are ineligible to use specific tools such as inclusionary zoning, planning authorities relied on this premise and used form and density targets to direct development of more compact and higher density housing forms to increase supply at lower cost. Housing affordability has worsened. The need for policy tools to direct form and supply towards affordability or attainability has increased.

Yet the term housing "affordability" only appears twice in the proposed Planning Statement, and attainable does not appear in the context of housing:

1. "Ontario will increase the supply and mix of housing options and address the full range of housing affordability needs; and
2. "Coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including housing affordability needs."

These changes suggest planning authorities are not expected to take a direct role in the affordability of housing as many of the tools that municipalities used to require lower-cost housing forms and higher densities to reduce housing costs are proposed to be removed.

There are limited tools that would require the development sector to provide affordable housing through the planning process under the proposed PPS. The municipal role appears to be to facilitate planning approvals of affordable housing projects in coordination with Service providers.

In Bruce County, planning and housing services work closely together to achieve increased supply of affordable housing. That partnership will continue. That said, the tools available through the PPS to require affordable and market-based range and mix of housing types, establish and implement minimum targets for the provision of housing that is affordable to low- and moderate-income households, and to align plans with housing and homelessness plans have been weakened or not been carried through into the new proposed PPS.

The removal of these tools appears contrary to the government’s goal of increasing affordable housing options.

### **Section 2.3 Settlement Areas and Settlement Area Boundary Expansions:**

Overall, the use of “should” instead of “shall” policy language has weakened municipalities’ ability to direct efficient growth within its own settlement boundaries. The draft PPS indicates the criteria for establishing a new settlement area or a settlement area boundary expansion “should” consider the criteria included in the PPS, including sufficient servicing capacity and the impact on agriculture.

The use of “should” may make it difficult for municipalities to turn down applications that fall short of demonstrating the criteria in the draft PPS.

The removal of the concept of a municipal comprehensive review is a significant change; this type of review has been in place since the 2005 Provincial Policy Statement.

The removal of comprehensive review requirements in the PPS means that settlement area boundary expansions, employment land conversion and the removal of prime agricultural lands could be permitted through an Official Plan Amendment at any time.

The removal of the requirement for a municipal comprehensive review also means that municipalities do not require consideration of the regional market area at the time of boundary expansion. The regional market area approach in the current PPS as part of a municipal comprehensive review created challenges to recognize and accommodate for different rates and types of growth occurring across Bruce County. The additional flexibility for municipalities to work with the County to plan for and implement appropriate boundary expansions is largely viewed as a positive change in the proposed 2023 PPS.

That said, the loss of tools such as the ability to establish intensification and density targets do challenge municipalities to “right size” their settlement areas to make efficient and effective use of their infrastructure and public service facility investments. The County recommends tools such as intensification and density targets be made available to municipalities beyond the 29 identified as large and fast growing.

### **Section 2.4 Strategic Growth Areas:**

This section is not applicable to Bruce County, as it only applies to the 29 large and fast-growing municipalities identified in Schedule 1 of the draft 2023 PPS. However, a review of this section notes that large and fast-growing municipalities continue to be able to use density targets to drive compact efficient development. This same tool is not extended to slower growing places, such as Bruce County. This will leave rural areas more vulnerable to hollowing out of downtowns in favour of sprawling suburban and ex-urban development, while cities will still be able to enforce some minimum growth targets that will help them invest in creating vibrant, walkable and complete communities. It is recommended that density targets be a tool that all municipalities should use.

### **Section 2.4.2.5 Major Transit Growth Areas:**

This section is generally not applicable to Bruce County. Major Transit Growth Area targets and criteria are largely available to large and fast-growing municipalities. That said, Section 2.4.2.5, identifies that planning authorities may plan for major transit station areas that are “not on higher order transit corridors” (e.g. not fully separate rights of way for buses, rails or light rail) by delineating boundaries and establishing minimum density targets.

Based on the openness of the language in 2.4.2.5, the ability to plan for major transit station outside of higher order transit corridors may create some opportunity for establishing density targets in smaller municipalities that wish to establish density that would support future transit. It may also provide the opportunity to access Inclusionary Zoning under the provisions of the Planning Act for municipalities that have not been identified as large or fast growing, such as Bruce County.

Bruce County requests the province provide some further explanation and guidance for municipalities that are not identified as large or fast growing to utilize major transit station area planning outside of higher-order transit corridors, as well as the use of inclusionary zoning in these areas.

### **Section 2.5 Rural Areas in Municipalities**

The absence of statements directing growth in rural areas into settlements, and conversion/redevelopment of rural housing means that there is a shift in the proposed 2023 PPS from limiting development in rural areas, to permitting dispersed growth of multi-lot-residential projects in rural areas outside hamlets, villages and existing clusters of homes.

Generally, the policy changes in Section 2.5 weaken the ability for planning authorities to promote investment in the vitality of rural settlement areas. The inclusion of the qualifier “locally appropriate” to the consideration of rural characteristics may not be effective in protecting those characteristics because the term “locally appropriate” is subjective in its interpretation. There are a number of criteria for urban boundary expansions which should be likewise considered in the context of rural development.

### **Section 2.6 Rural Lands in Municipalities**

The removal of the requirement to retain areas for new or expanding land uses that require separation from other uses is short-sighted. If residential development is allowed unchecked in all Rural Lands new uses like livestock facilities, aggregate uses, forest products processing and waste disposal sites will be harder to locate in rural areas in the future.

### **Section 2.8 Employment Areas**

Narrowing of the definition of Employment Areas will remove of protection for municipal business parks which include lighter industrial uses, institutional uses and offices. This may pose economic development challenges for municipalities. Existing planned land uses and

infrastructure may have to be reconsidered in municipal Official Plans and further expense may be incurred if new Employment Areas need to be identified.

Considering planning authorities may designate lands for employment beyond a 25-year horizon, additional clarity is needed to help municipalities determine the appropriate supply of Employment Lands that would be required over the longer term. A significant surplus of employment lands would be necessary to justify removal of employment areas. Although this gives municipalities more flexibility, infrastructure and servicing costs for industrial lands come with a high cost to municipalities. Slower growing rural municipalities may find the infrastructure costs of a larger supply of Employment Lands that distinguishes between protected employment lands and the broader supply of areas where people work difficult to financially manage. Bruce County has several business park areas where mixed uses are permitted and there is considerable pressure to permit a high proportion of residential development relative to employment; at the same time, Bruce County often sees multiple extension requests for draft approved residential subdivisions. Flexibility in conversion of employment lands, where appropriate, can be achieved without also narrowing the definition of employment.

### **Section 3.1 General Policies for Infrastructure and Public Service Facilities**

The addition of language in the proposed 2023 PPS regarding the coordination and collaboration between planning authorities and school boards on planning for schools and childcare facilities is well received. There is significant concern about school planning keeping up with population growth in many areas of the province, including Bruce County. Although new language is offered in the proposed PPS to address planning for schools and childcare facilities, the use of the words “should” and “encourage” would not require school boards and planning authorities to work together or necessarily address the funding requirements for school development.

### **Section 3.2 Transportation Systems**

The policy that refers to requiring a land use pattern, density and a mix of uses that minimize the length and number of vehicle trips and support current and future use of transit and active transportation is proposed to be deleted. This indicates a shift in priority away from any concern for reducing vehicle trips, which is contrary to the notion of creating complete community and addressing transportation as one of the major sources of climate-changing emissions.

Planning for strategic growth areas should not be limited to fast growing municipalities only. Rural areas should be able to direct growth to settlement areas, to make efficient use of infrastructure and minimize reliance on individual transportation.

### **Section 3.6 Sewage, Water and Stormwater Servicing**

Changes to servicing policies appear to remove limitation on individual onsite services in settlements to infilling and rounding out, however partial services remain limited to infilling and rounding out. This would appear to suggest that growth in communities where only one

service is available should not make full use of that service but should instead proceed on the basis of full services (at significantly higher cost) or private services (at significantly lower achievable density).

Clarification from the province is needed to understand if the intent is to prevent infilling and minor rounding out on private services or if the intent is to allow full scale development on private services in Settlement Areas.

The recognition that centralized and decentralized servicing systems can both be considered as municipal sewage and water services is a good addition to help facilitate municipal communal servicing solutions.

Policy wording for stormwater management planning is proposed to change from ‘the long term’ to ‘their full life cycle’. This change may not adequately consider ultimate replacement costs.

There are several references in the proposed new PPS to “ensuring appropriate sewage and water services”. With an increasing recognition of the potential for individual onsite sewage and water services to play a role in meeting housing needs, provincial direction on how to ensure appropriate sewage and water services are to be provided, in the context of individual lot creation proposals, would be beneficial. The existing MECP D5-4 guideline does not appropriately address individual lot creation, multiple uses on a lot, or the role of advanced technologies, resulting in variable approaches across the province.

#### **Section 4.1 Natural Heritage**

At the time of writing this report, natural heritage policies and related definitions remain under consideration by the provincial government. Once proposed policies and definitions are ready for review and input, they will be made available through a separate posting on the Environmental Registry of Ontario.

It is recommended sufficient time be given for the County to consult with municipalities, stakeholders and indigenous communities prior to the end of the public commenting period for the ERO posting for Natural Heritage changes.

It is also recommended that implementation of the proposed 2023 PPS be timed to include the proposed natural heritage policies. PPS changes have a corresponding impact on policies within the Bruce County Official Plan and Local Plans. Policies for Natural Heritage are inter-related with other policies and a comprehensive review of all the policy changes is required to ensure that policies can be implemented in an integrated manner. Issuing a comprehensive 2023 PPS that includes natural heritage policies for the implementation of a complete planning framework that would allow the County of Bruce to complete its work on the new County Official Plan.

## **Section 4.2 Water**

In removing the word “municipal” it appears that the responsibility of planning authorities to restrict development and site alteration has been expanded to protect all drinking water supplies, not just municipal drinking water supplies. Please clarify if this is the intent, and if so please provide appropriate resources and training to address this new responsibility.

Municipalities are encouraged to undertake watershed planning to inform planning for sewage and water services and stormwater management, and the protection, improvement or restoration of the quality and quantity of water. Municipal watershed planning seems peculiar given watersheds span multiple municipalities. Municipalities largely rely on Conservation Authority partners to assist with watershed planning as their boundaries transcend municipal boundaries and reflect the geography of watershed. Continuing to recognize the role of conservation authorities in watershed planning is important.

## **Section 4.3 Agriculture**

Farmland makes up 5% of Ontario’s land base, with 11,766,071 acres of farmland in Ontario. The 2021 Census of Agriculture identifies that Ontario is currently losing 319 acres of farmland per day. With the serious risks posed to agriculture in Ontario, the proposed severance policies introduced through the proposed 2023 PPS further undermine the economic viability of agriculture within Bruce County. While there is support of the province’s initiative to increase the supply of housing, it should not be at the expense of our ability to grow food.

The introduction of up to three new residential lots from farm parcels that existed on January 1, 2023 in prime agricultural areas has the potential to sterilize the expansion and establishment of new livestock facilities in Bruce County, and across Ontario.

The introduction of new non-farm neighbours introduces conditions that increase the potential for neighbour conflict and complaints that undermine the stability needed in the agricultural industry to make major investment in facilities and equipment to continue to produce food for the province, nation and the world with the efficiency and effectiveness demanded by the market.

There is likely to be interest from some landowners to create new lot(s) adjacent to previously severed surplus farm residences. This would set up a conflict between two PPS policies, the requirement to prohibit a residence on the retained land from a surplus severance, and the ability to create new residential lots adjacent to existing non-farm uses in the countryside.

Additional Ontario Land Tribunal cases may be anticipated as applicants test policies like the prohibition on residences following a surplus severance.

The proposed policies create significant risk of creating new sources of conflict and setbacks from new livestock facilities and manure storage facilities as well as other agriculture-related industrial uses that require setbacks, for example grain drying facilities and

agricultural commercial/industrial uses, through MECP D-6 guidelines, or Pits and Quarries through the Aggregate Resources Act.

The proposed policies conflict with efficient use of land objectives, draw development activity away from settlement areas, contribute to climate change, and increase municipal servicing costs.

The policies appear to permit residential lot creation only from lots used for agriculture (which is not defined) where it is adjacent (not defined) to a non-farm use or primarily lower-priority agricultural lands (not defined), without providing opportunity for infilling within legacy non-farm lots or areas of existing conflict that would offer additional housing supply opportunities without increasing countryside land use conflict.

Bruce County has undertaken an estimate of the cumulative effect of the proposed new severance policies in the prime agricultural area.

If every farm in Bruce County's agricultural designation took advantage of the proposed severance policies (4,900 farm parcels x 3 lots x 2 acres per severance) it would equate to the creation of 14,700 residential lots with an estimated loss of 29,400 acres of prime agricultural land within Bruce County.

Strictly looking at a farmland loss perspective this represents a physical loss of 5% of Bruce County's agricultural land. The loss of land is further compounded by impacting agricultural investment and siting of uses, as noted above.

While further definition and clarification is required to understand clearly understand the severance criteria included in the proposed 2023 PPS, the above estimate identifies there is a significant impact of the proposed severance policies in prime agricultural areas within Bruce County.

Bruce County is more supportive of settlement area boundary expansion than scattered residential development created through multi-residential development in rural areas, and residential lots proposed in prime agricultural areas.

### *Restriction*

The policies of the Provincial Policy Statement have always established minimum standards for land use planning in Ontario. This has helped County and local municipalities establish meaningful planning standards to protect prime agricultural land and minimize land use conflicts.

The inclusion of policy in the draft 2023 Provincial Policy Statement stating that "Official plans and zoning by-laws shall not contain provisions that are more restrictive than policy 4.3.3.1 (a) except to address public health or safety concerns" removes the ability to have local management of land uses that are central to our local economic. Bruce County asks

that the 2023 PPS continue represent minimum standards for land use planning and that local jurisdictions retain the ability to establish locally appropriate policies that meet or exceed PPS direction, so long as they do not conflict.

If committed to directing residential growth outside of settlement areas, it is suggested that the province consider:

1. Creating enabling policy for land division in Rural areas, outside of Prime Agricultural Lands / Agricultural System;
2. Establish a base lot count on original Township Lot Fabric to enable practical implementation, with a provision for infilling;
3. Clarify that controlling access to higher-order roads like collectors and arterials is an important public health and safety function;
4. Other relevant criteria to address the cumulative impacts of scattered development.

Generally, Bruce County is more supportive of settlement area boundary expansion than residential development created through multi-residential development in rural areas, and residential lots proposed in prime agricultural areas.

#### **Section 4.6 Cultural Heritage and Archaeology:**

##### ***Cultural Heritage***

On balance there appears to be less protection overall for cultural heritage resources in the proposed 2023 PPS. The language around protection of heritage property has changed from using the term “significant” to using “protected” to reflect Bill 23 changes that focus only on protection of designated heritage resources. The direction to consider the development of cultural plans for the protection of “cultural heritage” has been removed. The protection of heritage resources continues to be important to our communities in Bruce County, as it helps define the uniqueness of our towns and villages, as well as supports tourism experiences within the County.

##### ***Archaeology***

With respect to the conservation of archaeological resources “significant” has been removed; thus it would appear the direction expands the requirement to conserve all archaeological resources, not just those deemed to be significant. Clarification would be appreciated to understand how this changes current practices for protecting archaeological resources. Updated guidance and training from Provincial Ministries around the implementation of archaeology policies of the Provincial Policy Statement is requested, as are clear opportunities to address the costs of conserving archaeological resources that are uncovered through assessments related to growth and development.

Planning Authorities are now encouraged to develop Archaeological Master Plans for conserving archaeological resources. Generally, Bruce County is supportive of the proposed policy changes for archaeology. The direction to develop Archaeological Master Plans affirms the efforts that have already been undertaken in Bruce County.

Early engagement with Indigenous Communities is now a requirement of the PPS, to ensure their interests are considered when identifying, protecting and managing cultural heritage and archaeological resources, built heritage resources and cultural heritage landscapes. Bruce County has and will continue to build a positive relationship with our indigenous communities focused on early engagement on land use planning matters.

### **Section 6.1 Implementation and Interpretation:**

When implementing the Policy Statement, the Minister of Municipal Affairs and Housing may make decisions that take into account other considerations to balance government priorities.

This gives the Minister a broader range of considerations when implementing the PPS. This supports the change in the Planning Act that allows the Minister to issue orders (MZOs) that do not comply with the PPS or the Planning Act. It implies the Minister may not be held to the same standard as other planning authorities when making decisions on Official Plans.

The PPS requires planning authorities to keep their zoning by-law up to date with Official Plans and the PPS by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development. A decision of a local planning authority must be consistent with the PPS even if the Official Plan has not been updated.

Consideration should be given to the successive legislative changes that have been introduced within a short period of time. Planning Authorities need time to update Zoning By-Laws and Official Plans. It is recommended that workshops and training be offered by Ministry staff to help planning authorities understand the new changes prior to implementation.

### **Section 6.2 Coordination**

Planning authorities shall undertake early engagement with Indigenous communities and coordinate on land use planning matters to facilitate knowledge sharing, support consideration of Indigenous interests in land use decision making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights.

These changes appear to be positive, but Bruce County would recognize the comments of Indigenous communities as being most relevant to whether these changes are to be supported or not.

## Summary

Bruce County Council and staff appreciate the opportunity to provide input on the government's efforts to address the need for housing in Ontario through the proposed 2023 Provincial Planning Statement. We encourage the province to work with groups such as AMO and the Warden's Caucuses, as well as rural and small urban communities to engage in meaningful dialogue on the proposed changes and their implications for municipalities across Ontario.

Please contact the undersigned should you have any further questions.

[Warden Chris Peabody](#)

County of Bruce

[cpeabody@brucecounty.on.ca](mailto:cpeabody@brucecounty.on.ca)

[Claire Dodds, MCIP, RPP](#)

Planning & Development Director

County of Bruce

[cldodds@brucecounty.on.ca](mailto:cldodds@brucecounty.on.ca)

[Jack Van Dorp, RPP](#)

Manager of Planning

County of Bruce

[jvandorp@brucecounty.on.ca](mailto:jvandorp@brucecounty.on.ca)

cc: Minister Steve Clark  
Bruce County Council  
Bruce County CAO & Senior Management Team  
Municipal Clerks and CAOs  
MPP Lisa Thompson, Minister of Agriculture, Food and Rural Affairs  
MPP Rick Byers  
Association of Municipalities of Ontario  
Western Ontario Warden's Caucus