

May 29, 2023

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

By Electronic Submission through the Environmental Registry

**RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument;
ERO Number 019-6813**

To the Ministry of Municipal Affairs and Housing;

The Council of the Township of Edwardburgh Cardinal extends our thanks to the Ministry for the opportunity to provide feedback on the proposed new Planning Policy Statement. Edwardburgh Cardinal recognizes the need for more housing across Ontario and the Township is supportive of Ontario's goal to construct 1.5 million homes by 2031.

We recognize and applaud your efforts to increase our housing supply and make more lands available for development. We've noted more flexibility to expand or create new settlement areas, and less restrictions for lot creation outside of settlement areas, including the agricultural area. Edwardburgh Cardinal is aligned with this goal and is also working towards solutions to development barriers.

We understand this proposal aims to provide more flexibility in servicing options. Council has identified these policies as a significant barrier to growth within our rural and settlement areas. It has been noted in the past that partial servicing is not permitted, except to address a failed system; or for infilling or minor rounding out of development within settlement areas. We've noted that these restrictions are still proposed in the new planning policy document:

3.6.5 Partial services shall only be permitted in the following circumstances:

- a) where they are necessary to address failed individual on-site sewage services and individual on-site water services in existing development; or*
- b) within settlement areas, to allow for infilling and minor rounding out of existing development on partial services provided that site conditions are suitable for the long-term provision of such services with no negative impacts.*

We understand the policy is in place to prevent overuse of municipal water where a private septic system is in place. We believe the opposite situation, while less common, should be considered separately in the policy statement. In circumstances where private water could be used in conjunction with municipal sewer, it should be permitted, provided sufficient water quantity and quality is available. Further to this, we ask for clarity by adding definitions for “infilling” and “minor rounding out” within this context.

3.6.6 *In rural areas, where partial services have been provided to address failed services in accordance with policy 3.6.5 (a), infilling on existing lots of record may be permitted where this would represent a logical and financially viable connection to the existing partial service and provided that site conditions are suitable for the long-term provision of such services with no negative impacts.*

As we work together to remove barriers to development, we anticipate more lots will be created in our rural areas. We’ve noted that the current and proposed policies only allow partial servicing in the rural area for infilling on existing lots of record, and only where the partial services have been provided to address a failed service. The Township recommends that, where site conditions are suitable, partial services that are available to new and existing lots should be permitted, regardless of their origin.

Thank you for the opportunity to provide feedback on the proposed Planning Policy Statement. We welcome any questions or further discussion on our comments outlined here.

Sincerely,

Mayor Tory Deschamps,
On behalf of the Council of the Township of Edwardsburgh Cardinal