



October 21, 2019

Provincial Policy Statement Review
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M5G 2E5

Submitted electronically via: planningconsultation@ontario.ca

RE: Provincial Policy Statement Review – Proposed Policies, ERO 019-0279

The Residential Construction Council of Ontario (RESCON) is pleased to provide comments on the government's proposed Provincial Policy Statement changes.

RESCON represents over 200 residential builders of high-rise, mid-rise and low-rise buildings in the province. Our goal is to work in cooperation with governments and related stakeholders to offer realistic solutions to a variety of challenges facing the residential building industry which also have wider societal benefits. The focus of RESCON's work is on technical standards; labour relations; industry research and innovation; health and safety; regulatory reforms; training and apprenticeship.

Our main commentary regarding the proposed Provincial Policy Statement is that in the interest of streamlining and creating a one window approach to regulations, the Province should consider and incorporate into the provincial growth plans, including the Greater Golden Horseshoe Growth Plan, all Provincial Policy Statements (PPS) and show how various PPS provisions have been addressed in the growth plans.

As a result, for a growth plan area, all PPS would be assumed to have been incorporated and would no longer be relevant as the intent of the PPS and its relationships with other policies and the growth plans itself would have been addressed. This would guarantee that the Growth Plan could not be challenged on the basis that it does not address a certain Provincial Policy Statement. If the Growth Plan is found not to adequately address PPS provisions, then it could be amended accordingly when updated.

This would result in one set of standards and targets for industry to address – the provincial growth plans. This would also prevent the continual use of Provincial Policy Statements to challenge Growth Plans and slow down Official Plan and zoning alignments with the Provincial Growth Plan.



We appreciate the opportunity to provide our feedback and look forward to continuing our engagement with the government on these and other important industry issues.

Regards,

A handwritten signature in blue ink, appearing to read "ML", is positioned above the typed name of the sender.

Richard Lyall
President