

Attachment 1

York Region Comments on Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 (ERO # 013-4504), Proposed Framework for Provincially Significant Employment Zones (ERO # 013-4506), Proposed Modifications to O.Reg. 311/06 (Transitional Matters – Growth Plans) (ERO # 013-4505) and Proposed Modifications to O.Reg. 525/97 (Exemption from Approval – Official Plan Amendments) (ERO 013-4507)

ERO # 013- 4504 Amendment 1 to the Growth Plan for the Greater Golden Horseshoe

General Comments	
	<p>York Region staff are generally supportive of the Province's direction proposed in Amendment 1 for York Region of continuing to prioritize growth through intensification and increasing flexibility for municipalities.</p> <p>The Growth Plan presents challenges for the Region with respect to meeting growth targets and providing the necessary infrastructure to service that growth. It is recommended that the review of the Growth Plan result in consequential amendments to other regulations to streamline Environmental Assessment and other provincial approval processes to bring infrastructure online more quickly to service designated and planned growth.</p>
Intensification and Density Targets	
2.2.2.1, 2.2.7.2	<p>Staff support the proposed minimum intensification target of 60 percent and the Designated Greenfield Density Target of 60 residents and jobs per hectare for York Region. Both are appropriate and reasonable targets for York Region given the level of transit infrastructure investment and the well-established land use planning framework for Regional centres and corridors as well as local centres and corridors and other intensification areas.</p> <p>Although not applicable to York Region, staff note that the proposed DGA densities of 40 and 50 residents and jobs per hectare proposed for the other two groups of municipalities in the GGH are lower than typical subdivisions being built today and are lower than the 2006 Growth Plan 50 density target since the 2006 DGA density calculation included employment lands (which are typically at a lower density than community lands). In staff's view, the Designated Greenfield Area target should be set at 60 for all municipalities in order to promote transit supportive complete communities.</p>
2.2.2.4, 2.2.7.4	<p>Staff accept the reduced criteria for alternative intensification and density targets provided that the prime direction of the Growth Plan of prioritizing growth intensification is maintained when the Province is assessing alternative targets. An additional criterion is also recommended that requires that an alternative intensification target be higher than historic intensification levels.</p> <p>The proposed amendment states that Councils can request alternative targets for intensification at any time and not be restricted by the timing of a MCR. Alternative targets should only be requested at the time of a MCR in order to properly align with forecasting and</p>

	growth management work that is undertaken as part of the MCR.
Employment Planning	
2.2.5.10	<p>Staff recommend employment land conversions remain at the time of a Regional municipal comprehensive review. Conversions of employment lands need to be assessed in the context of the overall Regional employment land base and employment forecast. In addition, the requirement to maintain “a significant number of jobs” on lands being considered for conversion is too vague and open to a wide range of interpretation.</p> <p>Notwithstanding staff’s position stated above, if the Province decides to proceed with the one-time window for conversions, these should be limited to only municipally initiated conversions. Staff also request that language be clarified in the amendment to indicate that it would be only a one-time window for conversions.</p> <p>Staff request clarification on what constitutes “at the time of next municipal comprehensive review” in the context of the “one time window” for considering employment land conversions? It is not clear if this provision only applies to municipalities that have not commenced their municipal comprehensive review processes?</p>
2.2.5.4	Staff accept the proposed change to require municipalities to set multiple density targets for employment areas rather than a single target.
2.2.5.5 2.2.5.6 2.2.5.7	Staff agree with the policy direction on locating and preserving employment areas adjacent to major goods movement facilities and corridors and the requirement to provide for an appropriate interface between employment areas and adjacent non-employment areas. Staff also support the proposed policy to allow for employment area designations to be incorporated into upper or single-tier official plans by amendment at any time in advance of the next MCR.
2.2.5.8	This policy should prioritize the minimization or mitigation of adverse impacts on sensitive land uses and not the other way around.
2.2.5.12	Staff support identifying provincially significant employment zones to protect the Region’s employment land base but as stated above, maintain that all employment land conversions should only be considered at the time of a Regional municipal comprehensive review. Comments on the mapping for the provincially significant employment zones are provided under the comments section on the Proposed Framework for Provincially Significant Employment Zones in this Attachment.
2.2.5.14	“Outside of employment areas, redevelopment of any employment lands should retain space for a similar number of jobs to remain accommodated on site.” Suggest simplifying this policy to say that the redevelopment should accommodate a similar number of jobs.
Definitions	<p>Province should add a definition of provincially significant employment zones in the definition section of the Growth Plan.</p> <p>Amendment 1 proposes to change the definition of office parks to delete the component of the definition that states they are employment areas designated in an official plan. This could</p>

	be interpreted that office parks in employment areas would no longer be considered employment lands and therefore would not be subject to any employment land conversion policies. Assuming this is not the intent, staff request the Province to clarify the definition and policies around office parks.
Settlement Area Boundary Expansion	
2.2.8.5 2.2.8.6	<p>Settlement area boundary expansions should only be considered at the time of a municipal comprehensive review (MCR) when there can be a full assessment of the need for the expansion in the context of the overall Regional structure, supporting infrastructure and population and employment forecast.</p> <p>If the Province proceeds with this policy, it should be clarified there is a limit of a potential total expansion of 40 hectares outside of the MCR process. In addition, if this policy is maintained, any potential 40 hectare settlement area expansion should only occur as a result of an upper or single-tier municipally initiated process.</p>
2.2.8.4	Staff do not support the proposed provision allowing municipalities to adjust settlement area boundaries outside the MCR if there is no net increase in land within the settlement area. This policy could lead to multiple ad hoc adjustments across the Region without proper regard for the Region's population and employment forecast, planned urban structure and other considerations in planning for appropriate locations for growth. In addition, it is not clear whether the exchange of lands in the Province's proposed policy would be an exchange of the same type of lands. For example, could there be an exchange of non-developable lands within the settlement area for developable lands outside of the settlement area?
2.2.8.3	Staff generally support the amended criteria to evaluate locations for settlement area boundary expansions which provide more flexibility and focus on outcomes rather than specific studies in meeting requirements. Staff do have concerns regarding the change in Section 2.2.8.3.d – which proposes to change the language from stating that the proposed expansion including the associated water, wastewater and stormwater servicing would not negatively impact the water resource system to minimize and mitigate potential negative impacts on watershed conditions. This is counter to other Provincial direction including source water protection and Section 4.2.1. – Water Resource Systems in the Growth Plan.
Small Rural Settlements	
2.2.9.7	Any boundary expansions of rural settlements should occur as part of a municipal comprehensive review. In addition, the lack of definition for the term “minor” could lead to misuse of this policy. If the Province decides to proceed with this policy, rural settlement boundary adjustments should be municipally initiated.
2.2.9.7.c	It is recommended that this section specify that servicing is achievable through reserve infrastructure capacity, similar to how it is addressed in section 2.2.8.5.d
Definitions	Staff support removal of the term “undelineated built-up area” and introduction of the defined term rural settlement to recognize areas which are not intended to accommodate significant

	growth and which would not be considered part of the Designated Greenfield Area.
Major Transit Station Areas	
2.2.4.4	Staff request an additional criterion be added to allow alternative minimum density targets for MTSA's that have very limited intensification potential in both the short and long term based on existing development in the surrounding lands.
2.2.4.5.	Staff support the proposed policy to allow municipalities to delineate and set density targets for MTSA's in advance of the municipal comprehensive review. Staff note that this process is already underway as part of the Region's current MCR, so the new provision would likely not result in a more expedited process for the current MTSA delineation and target setting process. Going forward, it would be useful to employ a streamlined approach to delineate and set targets for new MTSA's or modifications to existing MTSA boundaries and/or density targets.
Definitions	Staff support additional flexibility provided in clarifying that MTSA's can range from an approximate 500 to 800 metre radius from a transit station subject to our comments on Section 2.2.4.5, giving flexibility to municipalities.
Agricultural and Natural Heritage Systems	
4.2.2.4 4.2.2.5 4.2.6.7 4.2.6.8	<p>Staff support proposed changes that specify provincial mapping of the agricultural land base and Natural Heritage System for the Growth Plan does not apply until implemented in the Regional Official Plan as well as the ability for municipalities to refine and implement provincial mapping in advance of the MCR. This provision provides upper and single-tier municipalities with the flexibility to advance the work associated with the mapping and policies required to conform to the Growth Plan or undertake it during the municipal comprehensive review process.</p> <p>Staff also agree with the specification that once provincial mapping of the agricultural land base has been implemented in official plans, further refinements may only occur through a MCR.</p>
4.2.6.3	With respect to the interface between agricultural and non-agricultural uses outside of settlement areas, staff agree with the new provision that mitigation measures, where appropriate, should be based on an agricultural impact assessment.
Other Areas	
1.2	Request clarification on how the Province is defining "market demand" and how that is to be balanced while ensuring housing supply meets local need through a full range and mix of housing types and tenures including affordable housing. Market demand should not be prioritized over unsustainable forms of development. The Province could consider linking the phrase "what is needed in local communities" to local housing needs identified through 10-year housing and homelessness plans, which would align with Growth Plan section 2.2.6.1.c.

	<p>With respect to rental housing supply, municipalities lack the necessary tools and resources to match demand with supply. The Province should consider introducing new tools, such as the ability to zone by tenure recently introduced in British Columbia, to assist municipalities in responding to market and local community needs.</p> <p>Staff support the Province's mandate of putting people first. To support this, it is recommended that re-inclusion of social equity in the Vision is needed. As noted in Section 2.2.1.4, social equity is an important element in complete communities where people live, work and play.</p>
2.1	<p>In third last paragraph of Section 1.2. request removing "in larger urban centres" and adding a revision that would indicate that all communities need to grow at transit supportive densities appropriate for the local context and transit service being contemplated, rather than just those in larger urban centres.</p> <p>As identified in York Region's submission on the Made-in-Ontario Environment Plan, the Growth Plan provides critical direction that supports Greenhouse Gas reduction and community resilience. It is recommended that the proposed GHG reduction target of 30% below 2005 levels by 2030 be considered a minimum. The Province is encouraged to establish a longer term (2050 target) aligned with the Intergovernmental Panel on Climate Change.</p>
2.2.1	<p>Section 2.2.1.4.f. – Amendment 1 proposes to remove the reference to "low carbon communities", staff question how will the objective of being more environmentally sustainable be measured?</p> <p>Section 2.2.1.4.g. – Request that the word "appropriate" be removed with reference to low impact development. The inclusion of this word weakens the policy direction for the implementation of green infrastructure.</p>
2.2.6.1	<p>Staff accept the proposed removal of the requirement for a formal Housing Strategy but also recognize that the Housing Strategy is a key input to the Provincial Land Needs Assessment Methodology. Staff recommend that the Province amend the current Land Needs Assessment Methodology (LNA) to reflect the removal of the Housing Strategy. It should also be recognized that there will still be the need to plan for housing need with respect to determining housing mix options and affordable ownership and rental targets which will be required as inputs to the LNA.</p>
3.1	<p>In second paragraph, recommend returning text to "lower density development" from unmanaged growth in the statement "costs could be saved by moving from unmanaged growth to a more compact built form." Unmanaged growth could include both low and high density development. The statement makes more sense as previously written since lower density development is generally more costly to service.</p> <p>More generally, there is reference throughout the proposed Amendment to "unmanaged growth." This term implies municipalities and the Province have had little control over growth</p>

	<p>in the GGH. It is recommended that a term such as “non-transit supportive growth” or similar be used.</p> <p>It is stated that the Plan aligns with provincial asset management regulations on page 26. It is recommended that consideration be given to protecting lands needed to facilitate asset management activities (e.g. easements) through a similar mechanism used to protect for transit corridors or employment areas.</p>
3.2.6.2.c, 3.2.7.1a, & 4.2.1.3	<p>Water and Wastewater Systems, Stormwater Management, Water Resource Systems</p> <p>It is recommended that “or equivalent” be removed. Watershed plans are important tools that help ensure drinking water sources are protected and should not be overridden.</p>
4.2.10	<p>Climate Change</p> <p>It is recommended the Province define what “other provincial plans and policies” take the place of the Ontario Climate Change Strategy. It would be beneficial for these to be defined to provide clarity on the guidance municipalities can use to ensure a consistent approach in developing vulnerability risks assessments, assessment of climate change impacts, etc.</p>
5.2.2	<p>Supplementary Direction</p> <p>Staff have concern regarding the potential for the Province to identify, establish or update “provincially significant employment zones” without consultation with municipalities. Recommend modifying this direction by inserting “in consultation with upper and single tier municipalities.”</p>

ERO # 013- 4506

Proposed Framework for Provincially Significant Employment Zones

Staff support the concept of provincially significant employment zones to be identified by the Minister of Municipal Affairs and Housing. Recommended modifications to the employment zone mapping are provided in Attachment 2 (pages 3, 4 and 5). The modifications consist of areas that Regional staff are proposing be added based on local municipal employment area designations as well as areas recommended for removal based on non-employment land use designations. The mapping in Attachment 2 highlights selected larger suggested modifications to the provincially significant employment zone boundaries. It is requested that Provincial staff follow-up with York Region staff to review in detail the complete proposed mapping modifications. Staff are proposing that designated employment lands along 400 series highways in the Region be added as provincially significant employment zones. These areas have potential to be significant concentrations of employment and economic output when developed and need to be protected for employment uses.

The Province is seeking feedback on whether employment areas that overlap with MTSAs should be included in the provincially significant employment zones. In our view, certain MTSAs may only have employment generating uses but at transit supportive densities, therefore, there is no need to exclude MTSAs from provincially significant employment zones.

ERO # 013- 4505

Proposed Modifications to O.Reg.311/06 (Transitional Matters – Growth Plans)

This regulation prescribes transition provisions for growth plans under the Places to Grow Act.

Although staff have been advised by Provincial staff that this regulation does not propose to eliminate the standard land needs assessment methodology, staff want to re-iterate the importance of having a consistent standard approach to land needs assessment. Staff support the current land needs assessment methodology as set out by the Province. In regards to this transition regulation, the Province is also seeking feedback as to whether there are any specific planning matters in process that should be addressed through the transition regulation. Staff would agree with the example provided by the Province that adopted official plan amendments under appeal should be subject to a transition regulation.

ERO # 013- 4507

Proposed Modifications to O.Reg.525/97 (Exemption from Approval – Official Plan Amendments)

The purpose of this regulation is to facilitate the proposed amendments to the Growth Plan that would allow municipalities the flexibility to make changes to their official plan to implement the Agricultural System for the Greater Golden Horseshoe mapping or the Natural Heritage System for the Growth Plan mapping before their next municipal comprehensive review, while ensuring that the Minister's approval would be required for these changes. Staff support the proposed changes to the regulation.