

The Regional Municipality of York

Regional Council
Planning and Economic Development
December 15, 2022

Report of the Commissioner of Corporate Services and Chief Planner

Review of A Place to Grow and Provincial Policy Statement

1. Recommendations

1. The Province be urged to allow time for meaningful engagement with municipalities and stakeholders on the review of the Growth Plan and Provincial Policy Statement.
2. The Regional Clerk forward this report to the Minister of Municipal Affairs and Housing.
3. The Regional Clerk circulate this report to the Clerks of the local municipalities.

2. Summary

This report, along with attachments, provides comments on the Province's proposal to integrate the Provincial Policy Statement (PPS) and Place to Growth: Growth Plan for the Greater Golden Horseshoe (Growth Plan) into a new Province-wide planning policy document.

Key Points:

- Province is proposing to merge the PPS and the Growth Plan into a new Province-wide planning policy document
- York Region shares the Province's commitment to streamline the development process and increase housing supply however an integrated PPS and Growth Plan that would apply province-wide is not supported
- Proposed integration of the PPS and Growth Plan will fundamentally change over 30 years of steps taken by the Province and municipalities to coordinate and strengthen comprehensive planning in the Greater Golden Horseshoe (GGH)
- Proposed changes to the PPS and Growth Plan may have the opposite effect of getting housing supply to market faster if local municipalities have to pause their OP Reviews to address policy changes
- The Province is urged to allow time for meaningful engagement with municipalities and other stakeholders on the review of the PPS and Growth Plan and request that any resulting new policy documents be subject to meaningful consultation

3. Background

In tandem with Bill 23, the Province is proposing to incorporate the Growth Plan with the Provincial Policy Statement as a new Province-wide planning policy document

Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe both provide comprehensive and integrated Provincial policy direction on land use planning. The PPS is issued under the *Planning Act* and is the primary Provincial land use planning policy document, applying across Ontario. The Growth Plan works with the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan to provide a more detailed framework for where and how growth should be accommodated in the GGH. Both provide fundamental guidance for land use planning decisions in the context to which they apply.

In tandem with Bill 23 (see report Implications of Bill 23, More Homes Built Faster Act, 2022 on this agenda), on October 25, 2022 the Province of Ontario released a [proposal](#) to integrate the PPS and A Place to Grow to support Ontario's More Homes Built Faster: Ontario's Housing Supply Action Plan. The primary intent is to remove or streamline policies that result in duplication or delays in the development of housing to increase housing supply through a more streamlined, Province-wide land use planning policy framework.

Preliminary comments on the new integrated PPS and Growth Plan consultation document were submitted through the Environmental Registry of Ontario in November

Comments on key questions and core elements of the proposed new integrated PPS document were requested through the Environmental Registry of Ontario (ERO) by December 30, 2022. While this report provides a comprehensive response to the proposal, a preliminary response was provided through the ERO in November (Attachment 1), in time to be considered by the Standing Committee hearing Bill 23 submissions. This was part of a package of 18 responses to individual ERO postings related to Bill 23.

This preliminary response highlighted the magnitude of the proposed changes and potential impacts to comprehensive and integrated planning. The primary focus of the letter was to urge the Province to slow down and consult with municipalities prior to making such significant changes to Ontario's planning framework, particularly the GGH. Attachment 2 provides additional comments to be submitted to the Province, responding to questions in the ERO posting.

4. Analysis

Consideration of the merging of the PPS and Growth Plan proposal should allow more time for meaningful engagement

Since 2019, the current Provincial government has tabled three bills (Bill 108, Bill 109 and Bill 23) to support the More Homes, More Choice: Ontario's Housing Supply Action Plan. All three bills introduced extensive legislative changes and were given brief commenting periods. Bills 108 and 109 were approved shortly after or before the commenting period ended. For more information on this process, please see report Implications of Bill 23, More Homes Built Faster Act, 2022 on this agenda.

Previous amendments proposed to Provincial Plans have historically provided longer commenting windows and consulted municipalities in advance of the released proposals. The magnitude of the proposed changes to these integral Provincial planning policy documents requires more detailed assessment and consultation which cannot be achieved through the commenting window provided.

In response to a November 10, 2022 update on Bill 23, Council passed a motion requesting the Government of Ontario halt Bill 23 and convene consultation with the Housing Supply Action Plan Implementation Team to ensure municipalities can work in partnership with the Province to address the housing affordability crisis. Although the Province passed Bill 23 prior to the end of the commenting deadline it is recommended that the PPS and Growth Plan review be provided broader consultation than Bill 23, allowing more time for meaningful consultation.

York Region shares the Province's commitment to streamline the development process and increase housing supply

While York Region is supportive of the objective of Bill 23 to streamline the development process and increase housing supply, the proposed integration of the PPS and Growth Plan into one Province-wide policy document is concerning. The PPS and Growth Plan serve distinct and important purposes in shaping and managing growth in Ontario. While the PPS is less prescriptive and applies throughout Ontario, the success of the Growth Plan's more detailed policy direction for the GGH is just starting to be realized with more intensified vibrant urban centres, supported by Provincial and regional infrastructure. In York Region, communities have been built at increased densities with a broader mix and range of housing types, higher levels of intensification have been achieved to support using land more efficiently, and York Region's Centres and Corridors are transforming into transit supportive high-density nodes and corridors.

The Greater Golden Horseshoe (GGH) is one of the fastest growing regions in North America and the growth management challenges, infrastructure planning and financial investment required to support the forecasted growth for this region are significantly different than the rest of Province. Current Growth Plan policies provide direction to municipalities within the GGH on how to manage growth in a coordinated, financially sustainable way while limiting sprawl-like growth and ensuring protection of agricultural and natural areas.

Amalgamating the PPS and the Growth Plan into one Province-wide, “one-size fits all” plan contradicts the original intent of these separate but complimentary policy documents and could stall advancements the Growth Plan has made in controlling sprawl and building thriving transit-supportive communities in an efficient financially sound way.

Hasty integration of the PPS and Growth Plan could inadvertently detract from 30 years of advancements taken by successive Provincial and Municipal governments to strengthen comprehensive planning in Ontario

Proposed changes to merge the PPS and Growth Plan have the potential to fundamentally reshape Ontario’s planning framework, which currently provides a clear and effective integrated policy framework that has taken years to establish. Changes to comprehensive planning has already occurred by the removal of Regional Official Plans in the GGH.

Successive Provincial governments in Ontario have long recognized the importance of integrated planning. Starting with the Office of the Greater Toronto Area in the late 1980s, the Province recognized the importance of a standard set of regional forecasts to facilitate comprehensive planning and coordinated infrastructure delivery within the Greater Toronto Area (GTA). All municipalities agreed to use these forecasts as the basis for long term planning and infrastructure needs in the context of the broader regional market.

Coordinated and comprehensive planning continued to evolve and ultimately led to the creation of the Growth Plan for the Greater Golden Horseshoe in 2006. It was developed to guide and change the pattern of development in one of the fastest-growing metropolitan regions in North America after studies had shown that the low-density, car-oriented development that prevailed in the 1980s and 1990s would, if continued, lead to worsening traffic congestion, a widening infrastructure deficit, increasing environmental degradation, the loss of high-quality farmland, and other negative consequences.

While assessing options to streamline and remove duplication is appropriate, the proposed new integrated document may reinstate a more ad-hoc and reactive method of planning rather than the strategic “big picture” and integrated planning approach advanced over the past 20-30 years.

Merging the PPS and the Growth Plan could remove the integrated, comprehensive, strategic, and standardized approach for growth provided by the Growth Plan. Over 100 single- or lower-tier municipalities in the GTHA would be taking their own approach to growth management. The challenges in planning and managing the rapid growth of this highly urbanizing area require a distinct, comprehensive planning framework separate from the rest of the Province given Federal, Provincial and regional infrastructure, particularly water and wastewater, transit and transportation infrastructure, required to support it. The current approach provides clarity and certainty to stakeholders involved in planning and implementing growth and helps ensure the GGH region remains prosperous for decades to come.

Growth Plan provides a comprehensive planning framework for the GGH addressing Provincial and regional interests across municipal boundaries

Since inception, the primary objective of the Growth Plan has been to ensure municipalities plan their communities in a comprehensive, integrated manner delivering complete communities and a thriving, prosperous economy over the long term. Its release marked a major milestone in the history of Ontario planning, proactively addressing the highest growth area in the Province. The plan received North American recognition having won several awards for its innovation and forward thinking at the time.

The Growth Plan has experienced a series of updates over the past 16 years by various governments, including the current government, with each update reflecting and recognizing the importance of comprehensive and integrated financially sustainable planning in Ontario. The most recent changes, finalized in 2020, resulted in uploading increased responsibilities to upper-tier municipalities in the areas of planning for employment and Major Transit Station Areas. These changes recognized the importance of comprehensive planning when addressing broad Provincial and regional interests that cross local municipal boundaries.

Given that regional planning responsibilities have recently been downloaded to local municipalities through Bill 23, upper-tier municipalities in the GGH without planning responsibilities will have more focus on delivering the comprehensive growth management policy directions set out in the Growth Plan, including monitoring and updating population and employment forecasts in response to actual development. This in turn will allow for more efficient longer-term planning, local official plan updates and present opportunities for identifying and implementing further efficiencies in the process to help achieve the common goal of increasing housing supply and streamlining development processes.

York Region has made, and will continue to make, significant investments in infrastructure to support long-term planning and growth

Fundamental to the Growth Plan are regional growth forecasts which provide a foundation for growth planning and infrastructure service delivery, informing decisions on when and how to expand the settlement areas in a financially sustainable manner. The Plan provides a framework for comprehensive planning of broad regional interests such as York Region's Centres and Corridors and employment areas. Over the years, Council together with Federal, Provincial, and local municipal governments, have made significant investments in major infrastructure to support growth in York Region. Between 2009-2013, the Region invested \$400-500M per year to deliver major water/wastewater, integrated transit, and regional transportation investments which have supported the Region's rapid growth. These major pieces of infrastructure were put in place to support growth over a long period of time across all nine local municipalities. These services and systems, and the distribution of growth across the local municipalities are a direct result of comprehensive planning driven in large part by Growth Plan policies and targets. Integration and coordination of growth and infrastructure delivery will continue, and this benefits from the policy framework provided by the Growth Plan.

In planning for the next thirty years, there will continue to be a need for significant infrastructure investment to support growth. In this regard, Council has requested that Great

Lakes based servicing be an option for servicing existing communities in the Oak Ridges Moraine Conservation Plan and Greenbelt Plan areas ([Recommendation #5, Attachment 2, Clause 4, Report 13, dated September 22, 2016](#)). A modification to Provincial Plans in this regard would provide additional options for accommodating growth in the Region to 2051.

Changes associated with Bill 23 only increase the need for collaboration and integrated planning

Bill 23 will change the way municipalities fund infrastructure required to support growth, with less revenue generated from development charges. The paramountcy of aligning growth and infrastructure, as articulated in the Growth Plan, will increase with further constraints on how infrastructure is funded. Growth cannot occur everywhere at once and will need to be phased to ensure financial sustainability.

Integrating the PPS and Growth Plan may remove transparency about the importance and necessity to align growth and infrastructure delivery. Policy direction suggestions in the consultation document is likely to result in disjointed approaches to growth management across the nine local municipalities which could create conflict and a 'competition' environment, rather than supporting the prioritization of new infrastructure projects in a financially sustainable manner to maximize growth potential and return on investment.

Impact of merging the PPS and Growth Plan will not be felt for decades and may weaken ability of achieving short-term objectives to build more homes

Municipalities in the GGH have spent the last several years conforming to the Growth Plan's planning framework for growth management. With recent approval of six upper and single-tier official plans, spanning 36 local municipalities, the Province has approved enough land to support housing growth to 2051, and the GGH share of 1.5M homes Province-wide.

York Region's intensification framework consisting of Centres and Corridors and Major Transit Station Areas, approved through the Regional Official Plan, accommodates 500,000 people through intensification units. This, along with the expanded urban area, provides growth potential well beyond the Region's 30-year planning horizon, and the Region's share of 1.5M homes. Additionally, York Region continues to have a healthy housing supply of approximately 62,000 units either awaiting final approval or already approved that remain unbuilt.

In this context, there is time to consult on opportunities to streamline the PPS and the Growth Plan to remove redundancies and increase efficiencies. Doing so will provide opportunity to minimize risk of unintentionally decelerating development and getting housing supply to market faster.

5. Financial

Core elements of the proposed integrated PPS and Growth Plan document have the potential to challenge the Region's ability to support growth in a financially sustainable manner. The proposed direction away from comprehensive planning will challenge the

Region's ability to ensure infrastructure investments are aligned with growth to optimize return on investment.

Additional financial implications may be incurred by local municipalities who would be required to rescope Official Plan updates that are well underway to conform to new Provincial policy, if implemented.

6. Local Impact

Local impact of an integrated PPS and Growth Plan could be significant. Not only might it result in delays in completing local Official Plan updates that are underway under the current planning framework, but it could result in more strain on local municipalities to address broad planning interests previously undertaken at the Regional level. It is likely that municipal Official Plan updates would be temporarily stalled and re-scoped as municipalities now need to conform to new Provincial policy. In many cases, local municipalities do not have the capacity to take on these additional planning responsibilities, which may result in delays to development approvals and housing development.

7. Conclusion

Given the importance of both the PPS and the Growth Plan in shaping and managing growth in Ontario, embarking on changes to these documents without thoughtful consideration and consultation is unwise. The Greater Golden Horseshoe (GGH) is one of the fastest growing regions in North America and the growth management issues, infrastructure planning and financial investment required to support the forecasted growth for this region are significantly different than the rest of Province.

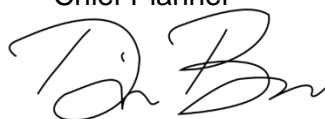
While the Region recognizes there may opportunity to refine the PPS and Growth Plan, merging the two documents is premature and may decelerate the development of housing if advanced at this time. The Region has a long history of working with the Province and the development industry to create innovative solutions in the public interest. The Region has participated in extensive consultations and collaboration efforts with the Province over the years including initial development of the Growth Plan as well as a number of subsequent policy updates to both documents. It is requested the Province allow time for meaningful collaboration.

For more information on this report, please contact Paul Bottomley, Manager, Policy, Research, and Forecasting at 1-877-464-9675 ext. 71530. Accessible formats or communication supports are available upon request.



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Approved for Submission:

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Attachment 1 – Letter to Anna MacDonald, MMAH
Attachment 2 – Response to Provincial Policy Statement