



November 18, 2022

Anna MacDonald, Director  
Provincial Land Use Plans Branch  
13<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON  
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**Re: Comments in response to the Review of A Place to Grow and Provincial Policy Statement ERO # 019-6177**

On October 25, 2022, the Province of Ontario released a proposal to integrate the Provincial Policy Statement (PPS) and A Place to Grow to support Ontario's More Homes Built Faster: Ontario's Housing Supply Action Plan. The comment period runs to December 30, 2022. These two important documents are fundamental in guiding land use planning decisions in the province. Bill 23, the "More Homes Built Faster Act" introduced on October 25<sup>th</sup>, 2022 proposes the most significant changes to the Ontario land use planning framework in 50 years and is being reviewed by municipalities throughout the province.

On November 10, 2022, in a response to an update on Bill 23, York Region Council requested that the Government of Ontario to halt Bill 23 and convene the [Housing Supply Action Plan Implementation Team \(HSAPIT\)](#) to ensure municipalities can work in consultation with the Province to address the housing affordability crisis in our communities.

This letter provides a preliminary response and recommendation to the above noted environmental registry posting. The short consultation period, coupled with the recent municipal election prevented timely Council endorsed comments and recommendations, prior to the Standing Committee submission deadline. Regional Council will consider these comments on December 8, 2022, following which additional Council comments will be submitted to the Province.

**York Region urges the Province to extend the consultation period and consult with municipalities**

Regional staff call upon the Government of Ontario to extend the commenting period for the review of A Place to Grow and the Provincial Policy statement beyond the

December 30<sup>th</sup> deadline. The Region has a long history of working with the Province and the development industry to create innovative solutions in the public interest. York Region has participated in extensive consultations and collaboration efforts with the Province over the years including development of the Growth Plan and a number of policy updates to both the PPS and Growth Plan. Regional staff urge the Province to slow down the consultation process to allow for more time to collaborate with municipalities on solutions that will streamline and accelerate the development of housing.

### **York Region is not supportive of integrating the two documents into one new Province-wide planning policy instrument**

Given the importance of both the PPS and the Growth Plan in shaping and managing growth in Ontario, York Region is not supportive of integrating the two documents into one new Province-wide planning policy instrument. 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. The challenges in planning and managing this growth requires a distinct, comprehensive planning framework separate from the rest of the Province to ensure the GGH region remains prosperous for decades to come. The Growth Plan provides an excellent framework guiding how growth should occur together with the understanding of where growth will not occur in the Greenbelt Plan and Oak Ridges Moraine Conservation Plan. Almost thirty years ago it became evident that these Plans were necessary, and they remain relevant today.

### **Merging the PPS and Growth Plan into one planning policy document will reverse 30 years of work the Province and municipalities have undertaken to strengthen comprehensive and integrated planning in the GGH**

The Provincial Policy Statement provides overarching policy direction on matters of provincial interest related to land use planning and development applicable to all areas of Ontario. It recognizes linkages among policy areas, the diversity of Ontario and that local context is important. The Growth Plan was introduced by the Provincial government in 2006 to guide and change the pattern of development in one of the fastest growing regions in North America. The Plan provides a unique, comprehensive approach to land use planning across communities in the GGH. The Growth Plan was the first regional growth management strategy of its kind in Ontario. 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.

Since inception, the primary objective of the Growth Plan has been to ensure municipalities plan communities in a comprehensive, integrated manner delivering complete communities and a thriving, prosperous economy over the long term. This is achieved by making better use of land and infrastructure and by focusing growth to existing urban areas which in turn helps address traffic congestion, maintain fiscal responsibility, improves air and water quality, and preserves agricultural lands and natural areas and resources. The Growth Plan has been reviewed and updated on numerous occasions over the past 16 years by various governments, including the current government, with each update reflecting and recognizing the importance of comprehensive and integrated planning coordinated in the GGH. The proposed changes will reverse 30 years of comprehensive planning work and “big picture” strategic planning by the Province and municipal governments and hinder the ability to facilitate financially sustainable comprehensive growth.

### **Merging the PPS and Growth Plan will have the opposite effect of getting housing supply to market faster**

The intent of both documents is to provide a long-term vision and planning framework for growth management to which municipalities across the GTHA have spent the last several years conforming to. Through the recent approval of six upper-tier official plans earlier this month, the Province has approved enough land to support housing growth to 2051 and beyond. In this context, it is unclear why the Province is rushing to update these documents, that have a longer term comprehensive planning focus. Proposed changes to the Provincial Policy Statement and Growth Plan may have the inverse effect of getting housing supply to market faster. Merging the two documents would result in more strain on local municipalities to address broad planning interests currently undertaken at the Regional level, in addition to the detailed planning matters currently the focus of local municipal planning.

It is likely that municipal Official Plan updates would be temporarily stalled and re-scoped as municipalities would 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 will result in delays to development approvals and housing development, all under an accelerated deadline. While the Region is supportive of efforts to streamline the development process and increase housing supply, we question whether merging the two documents would have the desired effect of accelerating the development of housing and increasing housing supply.

York Region recommends the Province re-consider making substantial changes to these two documents and instead slow down the consultation process to allow time for meaningful consultation with municipalities on solutions that will streamline and accelerate the development of housing. Further, once a new document is drafted, another extensive consultation period on proposed changes should follow.

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If you have questions regarding this response or would like to discuss these recommendations, please contact Paul Freeman, Chief Planner, Planning and Economic Development Branch at [Paul.Freeman@york.ca](mailto:Paul.Freeman@york.ca).

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Freeman", followed by a period.

Paul Freeman, MCIP, RPP  
Chief Planner

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