

## **Response to Review of A Place to Grow and Provincial Policy Statement - [ERO # 019-6177](#)**

**Responses to the posted discussion questions all point to similar conclusions that, while efficiencies and streamlining should be explored, the fundamental approach to managing growth in the Greater Golden Horseshoe should be preserved**

**Recommendation #1: Halt review of the PPS and Growth Plans as changes are not required to meet Provincial objectives to build 1.5M homes by 2031.**

The proposal to integrate the PPS and A Place to Grow into a new Province-wide document focuses on updating approaches to existing policy direction on six core element areas: Residential Land Supply, Attainable Housing Supply and Mix, Growth Management, Environment and Natural Resources, Community Infrastructure and Streamlining Planning Framework. The intended outcome of this review is to determine the best approach that would enable municipalities to accelerate the development of housing and increase housing supply (including rural housing) through a more streamlined Province-wide land use planning policy framework. A set of five discussion questions are included to address comments on proposed policy directions for the six core element areas. With recent approvals of GGH upper and single-tier plans, there is sufficient land to accommodate the Province's goal of 1.5M homes by 2022. With these plans in place changes to the PPS and Growth Plan will not impact growth in the immediate term (i.e., next 10 years).

**Recommendation #2: Focus current review to strategic opportunities to streamline and remove duplication rather than merging the two documents**

The proposed changes to the core elements, specifically those in the areas of growth forecasts, settlement area boundary expansions, employment area conversions and environment and natural heritage speak to a more reactive and local-specific planning approach, rather than a comprehensive planning approach. This direction is likely to result in disjointed approaches to growth management across municipal boundaries which will challenge the ability to plan for growth and infrastructure delivery in an efficient and financially sustainable manner, while preserving the natural environment and resources.

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 Region feels that changes to Provincial policy of this magnitude is not the solution. 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 Greater Golden Horseshoe (GGH) is just starting to be seen with intensified vibrant urban centres, well supported by Provincial and regional infrastructure. The Growth Plan has resulted in balanced growth that has made more efficient use of land, focussed growth in urban centres and created communities that are more resilient and adaptable to the impacts of changing climate.

## **Alternative ways to streamline development process and increase housing supply while maintaining existing Provincial planning policy documents**

Other changes proposed through Bill 23, which shift planning approvals to local municipalities will provide more opportunity for upper-tier municipalities to proactively plan in accordance with the Growth Plan which will assist in the preparation for more efficient Official Plan updates in the future. Diminishing the comprehensive approach to growth management will challenge the ability to phase and prioritize new infrastructure projects in a financially sustainable manner that maximizes return on investment. The following outlines additional opportunities that the government can seize to streamline land use planning policy to increase the supply of housing and support a diversity of housing types.

### **➤ Aligning Growth and Infrastructure**

#### **Recommendation #3: Preserve policies which comprehensively align growth management with infrastructure planning and financial sustainability**

Sustainable and financially responsible growth management will continue to be key for the Province's success over the long term. Certain core elements of growth management such as growth forecasts, intensification and density targets, settlement area boundary expansions, and employment area conversions represent broad regional and Provincial interests and are best dealt with comprehensively. A regional growth management approach that is integrated with infrastructure planning and financial planning has proved to be successful over the last few decades in using land more efficiently, reducing sprawl and in planning complete communities with a diversity of housing types.

### **➤ Stronger requirements for a range and mix of housing options**

#### **Recommendation #4: Continue to prescribe minimum intensification and density targets to promote intensification and the building of complete communities**

There is strong policy direction in existing Provincial Plans to achieve a range and mix of housing options to meet the needs of all Ontarians, including affordable and purpose-built rental housing. Strengthening requirements for affordable and purpose-built rental housing will support growth management and complete community objectives as there is a clear link between access to affordable housing and the ability of a jurisdiction to grow and thrive. Minimum intensification and density targets of the Growth Plan have assisted municipalities in the GGH achieve increased intensification in centres and corridors as well as increased densities and a greater mix of housing in new communities. The inclusion of these targets in the Growth Plan has helped streamline the development process by providing more clarity and certainty to the development industry, municipalities and the public as more homes get built.

### **➤ Streamline the Planning Framework**

Managing growth and planning comprehensively is an important requirement for high growth municipalities. The focus on planning in the Province should be to streamline the development

process and increase housing supply without compromising the quality of communities being built.

**Recommendation #5: To make the planning process more efficient, the Region recommends the following:**

**5a)** Limit the planning horizon to a shorter time frame (15-20 years). Longer term planning of 30 years increases complexity, accuracy, and results in a longer Official Plan update process;

**5b)** Consider a hierarchical approach to increase residential supply by prioritizing development in existing settlement areas, maintaining the intent of PPS policies 1.1.3.8, 1.4.1 and 1.4.3, and requiring municipalities to maintain an inventory of vacant and underutilized existing sites that can be used to prioritize future development and intensification.

**5c)** Continue to advance objectives of Bill 108 such as requiring complete and quality application submissions for development and standardizing Terms of References.

➤ **Implement sunset clauses on planning approvals and tools**

**Recommendation #6: Put tools in place to remove planning approvals for approved housing units that aren't built in a timely fashion**

York Region has a housing supply of approximately 62,000 units either awaiting final approval or already approved that remain unbuilt. Focus needs to be on why approved supply is not moving forward to construction. Implementation of sunset clauses (i.e., an expiration date/lapsing provision) and other tools for planning approvals, building permits and servicing allocation will ensure that development is constructed in a timely manner. Extensions or revisions to the original proposal could be made through an expedited review and approval process provided the proposal aligns with current policy direction (i.e., more diverse mix of housing), and adequate servicing is available.

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