

The Regional Municipality of York

Regional Council
Planning and Economic Development
May 18, 2023

Report of the Commissioner of Corporate Services and Chief Planner

Proposed Provincial Planning Statement

1. Recommendations

1. Council approve this report, Appendix A and Appendix B for submission to the Provincial Land Use Plans Branch, Ministry of Municipal Affairs and Housing in response to Environmental Registry of Ontario posting #019-6813.
2. The Regional Clerk forward this report to the Minister of Municipal Affairs and Housing and the Clerk's of the local municipalities.

2. Summary

This report seeks Council approval for comments on the Province's proposal to consolidate two major planning documents in Ontario: *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (Growth Plan), 2020 and the *Provincial Policy Statement, 2020*. The proposed Provincial Planning Statement, 2023 (the Statement) will form a single province-wide land use planning policy document to support the achievement of Provincial housing objectives.

Key Points:

- The Province released a proposed Provincial Planning Statement that integrates the Growth Plan for review and comment by June 5, 2023
- Streamlining planning approvals and providing flexibility in local municipal planning decisions are supported, but should not come at the expense of considerable gains in comprehensive planning achieved over the past 30 years
- As did Bill 23, *More Homes Built Faster Act*, the proposed Statement will complicate the Region's ability to align growth with infrastructure and financial planning
- Intensification targets and most density targets have been removed in the Statement creating uncertainty as to where growth will occur. This makes planning for community amenities a challenge since the objective is locations where they can serve the most residents

- Targets for, and the Provincial definition of affordable housing is proposed for removal and should be maintained to support monitoring and reporting on the success of the target and Provincial initiatives aimed at addressing housing supply and the affordability crisis
- Policies may result in more car dependent communities lacking adequate community services impacting public health and well-being, and pressure to expand planned municipal infrastructure

3. Background

Provincial Policy Statement provides comprehensive planning policy direction for Ontario that is different from the Growth Plan that address growth pressures for Greater Golden Horseshoe

The Provincial Policy Statement and the Growth Plan are foundational documents that provide Provincial policy direction on land use planning matters including growth management, infrastructure planning, protection of resources and protection of health and safety due to natural or human-made hazards.

The Provincial Policy Statement is implemented through section 3 of the *Planning Act* and is the primary provincial land use planning policy document, applying across Ontario. All planning decisions must be consistent with the Provincial Policy Statement, and all other Provincial plans are to be read in conjunction with the Provincial Policy Statement.

Working alongside the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Lake Simcoe Protection Plan, the Growth Plan identifies where and how growth is to occur in the Greater Golden Horseshoe (GGH) to promote economic vitality while protecting natural and agricultural systems. The Growth Plan outlines strategic locations for growth, land density targets and Provincial growth forecasts to 2051. These factors are essential to ensure an integrated approach to complete communities, and to make effective investments in infrastructure and public service facilities.

Key policy changes result from the proposed Provincial Planning Statement

Key changes resulting from the proposed merger of the current Provincial Policy Statement and Growth Plan into the Provincial Planning Statement, 2023 include:

- Flexibility for the planning horizon has been introduced by requiring the designation of land to accommodate growth for at least 25 years ('at least' being new)
- A common set of Provincial population and employment forecasts for use by municipalities will no longer be provided
- Municipal comprehensive reviews are no longer required and decisions on growth management, including settlement area expansion and employment conversion, can occur at any time

- The intensification target has been removed and the focus of intensification is limited to “Strategic Growth Areas”, which are only applicable to large and fast-growing municipalities; Provincial Urban Growth Centres are no longer referenced
- Minimum density for designated greenfield areas is encouraged and only a subset of Growth Plan targets has been maintained (MTSA densities) applicable only to “large and fast-growing municipalities”, elsewhere they’re optional
- The Provincial Planning Statement does not define affordable housing and has not brought forward targets for affordable or rental housing
- The definition of employment area and the policy approach to employment planning has changed, specifically by not including office in the definition, allowing more residential uses in some instances, and allowing conversion of employment lands at any time, with fewer tests
- The Statement eliminates the requirement to use the provincially mapped Agricultural System, and permits additional residential units and lots in the agricultural area

Implications of these changes are highlighted in this report and Appendices A and B.

Comments on the proposed Provincial Planning Statement are due June 5, 2023

In October 2022, ERO [posting #019-6177](#) requested ideas on how to integrate the Growth Plan and the Provincial Policy Statement. In [December 2022](#) Council expressed concern with the proposed merger and urged the Province to allow time for meaningful consultation since the proposal could undo significant progress between the Province and municipalities to coordinate and strengthen comprehensive planning in the GGH over the last 30 years. Council identified integrating the two documents may have the opposite effect of bringing housing supply to market faster if local municipalities pause their Official Plan reviews to address forthcoming policy changes.

On April 6, 2023 ERO [posting #019-6813](#), “Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument” included a proposed Provincial Planning Statement document for review with a commenting deadline of June 5, 2023. Once the new Provincial Planning Statement is approved, the Growth Plan will be revoked and the new PPS would take effect sometime in fall 2023. The proposed PPS document outlines policies grouped under five pillars:

- Generate an appropriate housing supply
- Make land available for development
- Provide infrastructure to support development
- Balance housing with resources
- Implementation

Concurrent with this ERO posting, the Province released [Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023](#). Bill 97 introduced proposed changes to the *Planning Act*,

Residential Tenancies Act (2006) and minor revisions to the *Development Charges Act* (1997), *Ministry of Municipal Affairs and Housing Act*, and *Municipal Act* (2001). A report to Committee of the Whole on [May 4, 2023](#) outlined details of Bill 97 legislative amendments to various statutes and provided a response.

4. Analysis

Municipal flexibility is supported but gains in comprehensive planning achieved over the past 30 years should be maintained

Prior to the mid 1990's, the Provincial policy framework lacked tools to allow for comprehensive planning. Specifically, the following were not addressed through provincial planning documents:

- A common planning horizon and Provincial population and employment growth forecasts
- Intensification and density targets
- Restrictions and conditions on converting employment lands

Lack of direction in these areas resulted in challenges, particularly in high-growth regions of the GGH. These challenges were experienced in planning, prioritizing and financing transit, aligning water and wastewater infrastructure, and community and emergency services to ensure residents and workers were well supported within their communities. Since the 1990's various iterations of the Provincial Policy Statement and Growth Plan have addressed this gap and strengthened comprehensive planning.

While flexibility is supported in some areas, as is streamlining the planning approval process, gains in comprehensive planning over the past 30 years need to be preserved for the reasons set out in this report, Appendix A, and Appendix B.

Housing development needs to be aligned with municipal servicing master plans to achieve the 1.5 million homes target

For the Province to achieve its goal of 1.5 million homes in 10 years, servicing and infrastructure sequencing will be critical. Infrastructure, community services and land use planning need to be closely aligned, which is the approach Council has taken through master planning aligned with the ROP. The Provincial Planning Statement should include the objective of long-term financial planning required to deliver and maintain sustainable infrastructure for years to come. It is imperative that comprehensive municipal infrastructure planning consider the financial, technical and operational needs of a growing Region.

Master plans and capital plans play a strong role in identifying areas that are ready, and those next in line for development. The Transportation Services and Water and Wastewater Master Plans identified regional costs to 2051 of nearly \$13 billion, with total costs, including expenditures by other levels of government, of \$21.6 billion. The Region's 2023 10-year

Capital Plan includes \$6.2 billion to support growth-related infrastructure primarily for roads, transit, and water and wastewater systems.

Phasing and sequencing of infrastructure allows for orderly implementation of servicing to planned and identified strategic areas. It is not financially feasible, sustainable or efficient to build disconnected (or interim) infrastructure to all corners of a municipality. Master Plans identify the quantum of infrastructure required to address growth to 2051, and capital plans identify needs for the next 10 years. Together these plans identify where, how and when servicing capacity should be delivered to enable housing to come online more quickly and cost effectively to support Provincial goals.

Broadening where housing is permitted may leave future residents with fewer community amenities and supportive services

The proposed Provincial Planning Statement's focus on housing supply promotes more dispersed development than the current Provincial Policy Statement and Growth Plan which direct, through targets, significant growth to areas supported by transit and community amenities. Proposed updates do not direct intensification to specific areas in a municipality or manage urban expansion as has been followed in Official Plans. The proposed Statement will allow growth and intensification more broadly and place demand for services over a larger geographic area.

The proposed Provincial Planning Statement also permits residential uses in previously protected employment and agricultural areas in an effort to bolster housing supply. This has implications for Regional infrastructure and services to support the potential distribution of more new residents in areas not anticipated. Proactive planning for services such as paramedics, fire, police, public health, transit, community housing and social assistance services will be more challenging with less certainty on growth areas. Additionally, services planned at the Regional level will need to be coordinated with nine local municipalities to prioritize capital investment and service delivery.

If the Provincial Planning Statement's aim is to increase housing supply to resolve affordability, then targets to monitor success need to be included

All references to affordable housing targets and definitions, as well as purpose-built rental targets, are removed with the proposed Provincial Planning Statement. Instead, the Statement indicates housing affordability needs are to be coordinated with Service Managers, like York Region, responsible for funding, administration and delivery of local housing and homelessness systems.

With these changes, the role of the private market and development industry in helping to address affordability is unclear. A bigger role for municipalities is a challenge, particularly given recent Development Charges Act, 1997 changes which make Housing Services no longer DC eligible.

Maintaining a consistent definition of affordable housing is important to support evidence-based accountability. Reviewing and maintaining an appropriate target along with consistent methodology for its application is essential and supports the continuation of current monitoring to assess trends and impacts of initiatives using a common baseline. Opportunity

for improvement, including consideration of MPAC as a consistent source of data, should be explored.

Provincial Planning Statement should reinforce the link between land use planning, quality of life and human health

Complete communities support quality of life and human health by encouraging the use of active transportation and providing high quality public open space, adequate parkland, opportunities for recreation, and access to local and healthy food. Complete communities support climate change mitigation by increasing the modal share for transit and active transportation and by minimizing land consumption through compact built form.

Proposed changes may impact delivery of complete communities impacting health and well-being, and prevention of chronic illnesses. The Statement should acknowledge the relationship between health and the built and natural environment.

Mixed-use communities are supported but business parks need to be protected for their ongoing economic viability

The definition of an employment area will significantly change with the proposed Provincial Planning Statement. This may impact where businesses locate and potentially reduce economic competitiveness. Many of the Region's current employment areas contain business park uses such as office uses not associated with industrial operations.

As proposed, office and retail uses will no longer be allowed in the redefined "employment areas", unless they are associated with the primary use (for example, office space within a warehousing facility). As a result, employment areas may need to be modified to exclude office developments. This will encourage office and retail uses in strategic growth areas and other mixed-use areas which is supported. Removing office uses from employment areas will result in increased competition with residential development, which the market favours over office.

Industrial, manufacturing and small-scale warehousing without adverse effects are also encouraged to locate in mixed-use areas. The intent is to promote more mixed land uses, including employment opportunities while separating those businesses not compatible with residential or commercial. Promotion of a range of uses in planned mixed use areas is a laudable goal, but this is a significant change and threatens land use compatibility and economic viability for some employment areas that may result in unintended land use conflicts.

Like concerns raised with other proposed changes, future residents living in these areas may not have the supports and amenities they need (parks, schools, open space, etc.).

Provincial Planning Statement proposes additional changes that have broad implications on future growth

The Proposed Provincial Planning Statement contains other changes that prompt additional comments as provided in Appendix A and Appendix B.

- Focusing housing on the 29 large and fast-growing municipalities, which in York Region includes only Markham, Newmarket, Richmond Hill and Vaughan, creates a patchwork of growth management approaches across the Province and among adjacent municipalities
- The lack of intensification targets, limited density targets, and no requirement of Major Transit Station Areas and associated density targets outside large and fast-growing municipalities impacts how infrastructure is planned for, and future ridership levels
- Relaxing policies for settlement area boundary expansions and allowing them on an ad hoc basis promotes unmanaged (sprawl-like) growth
- Increased opportunities for housing in Agricultural areas, previously restricted from development will increase automobile dependence
- Potential enactment of the Provincial Planning Statement in fall 2023, may create additional delays to bring housing online with uncertainty for local municipal Official Plan review and approval processes
- Proposed changes emphasize the need for a modernized environmental assessment process to address Provincial delays in infrastructure approvals

5. Financial

The Region's 2023 10-year Capital Plan includes \$6.2 billion to support vital growth-related infrastructure primarily for roads, transit, and water and wastewater systems. These plans were based on a growth management strategy resulting from a comprehensive review of growth needs to 2051. Master Plans for these service areas identified regional costs to 2051 of approximately \$13 billion, with total costs, including expenditures by other levels of government, of about \$21.6 billion.

An additional \$2 billion of expenditures beyond those included in the capital plan have been identified for priority projects that are needed to help build complete communities across the Region. These projects remain reliant on senior government funding commitments and are subject to the Region's fiscal capacity considerations. Included in the \$2 billion estimate is approximately \$1.5 billion to advance the Region's bus rapid transit network and \$0.4 billion for affordable housing initiatives.

Conversions of employment lands to residential also has the potential to consume more servicing capacity from existing infrastructure than contemplated which could necessitate additional infrastructure, as residential users consume water (or services) at a higher rate than employment uses (e.g., offices). Depending on uptake, settlement area expansions and policies permitting more dispersed intensification throughout settlement areas, could also increase expenditures for infrastructure and other services (e.g., transit and emergency medical services).

When the Region's Development Charges Bylaw is updated, growth projections are required as part of the background study. Lack of a common set of population and employment forecasts, on a region-wide basis, may complicate that process.

Staff will continue to monitor implementation of the proposed Provincial Planning Statement and any other legislative changes and, as more information is made available, report back on fiscal impacts that have budgetary ramifications.

6. Local Impact

Partnerships between York Region and local municipalities should be preserved while working together to streamline planning and respond to new policy direction

York Region and the nine local municipalities have worked together to implement the Growth Plan since its inception. Through the most recent Municipal Comprehensive Review to update the Region's Official Plan, combined efforts on forecasts, density targets, MTSA's, mapping and policy directions enabled Official Plans to reflect balanced future communities that bring economic opportunity and provide a good quality of life.

Markham Centre and Vaughan Metropolitan Centre (VMC) are well advanced, and expansion of the subway to Richmond Hill Centre will bring new connections to the GTA. The Growth Plan has helped to enable this planning, providing goals for municipalities across York Region so servicing and transportation connections could be well coordinated.

Continued collaboration between the Region and local municipalities to comprehensively plan and align growth with infrastructure is of paramount importance as we transition to a more streamlined planning process with additional planning approval authority shifting from the Region to local municipalities.

7. Conclusion

The proposed Provincial Planning Statement is anticipated to take effect in fall 2023. Comments on ERO [posting #019-6813](#), through this report will be submitted to the Province in response to the posting.

Critical aspects of existing provincial planning direction should be maintained through the proposed Provincial Planning Statement to provide a consistent approach to growth management, particularly for municipalities in the GGH. Policy direction should be maintained for coordinated infrastructure planning, protection of natural and agricultural areas and provision of services to avoid future communities which lack the components of a healthy built environment that promotes health and well-being of future residents.

For more information on this report, please contact Teresa Cline, Manager, Policy and Environment at 1-877-464-9675 ext. 71591. Accessible formats or communication supports are available upon request.

Recommended by: 
Paul Freeman, MCIP, RPP
Chief Planner


Dino Basso
Commissioner of Corporate Services

Approved for Submission: 
Bruce Macgregor
Chief Administrative Officer

April 13, 2023

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Appendix A – Response Letter for Bill 97

Appendix B – Comments and Response Table



Provincial Land Use Plans Branch
Via email: growthplanning@ontario.ca
13th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3
Canada

DRAFT

May 6, 2023

Re: Proposed Provincial Planning Statement ERO posting 019-6813

York Region Committee of the Whole received the attached report which outlines key comments on the proposed Provincial Planning Statement. In addition to those comments, the Region has the following additional comments, with detailed section by section comments attached

Municipalities not listed as ‘large and fast-growing’ are permitted, but not required to identify density targets

The proposed PPS identifies ‘large and fast-growing’ municipalities, which in York Region include the Cities of Markham, Richmond Hill and Vaughan and the Town of Newmarket. These municipalities have been assigned housing targets and associated housing pledges.

The proposed PPS focuses growth in these municipalities requiring them to identify strategic growth areas, delineate Major Transit Station Areas (MTSA) and set minimum density targets for both these areas. These municipalities are encouraged to establish density targets for new settlement areas or expansions, but this is not a mandatory requirement. Municipalities not listed as ‘large and fast-growing’ are permitted, but not required, to have these planning policies in place.

Comprehensive planning, and a level playing field for the Greater Golden Horseshoe is lost with a new patchwork approach to select areas in the Province.

Removal of the intensification target loses the focus of long-term planning goals and vision for future communities

The proposed PPS removes intensification targets. The intensification target across York Region ensured that 50% of all new residential development would be within the built-up area. Intensification targets ensure that a portion of new development is near infrastructure such as transit, water and wastewater servicing and community amenities. Intensifying

existing urban areas allows for housing units of varying types and sizes and limits the need for expansion of urban boundaries to accommodate additional population and employment. Intensification uses land efficiently and because amenities are close-by, encourages a more walkable community.

Although the proposed PPS encourages intensification, removing the target reduces certainty and transparency, eliminates an indicator for measuring and reporting progress, reduces motivation to change outdated and more costly land use patterns, and diminishes the focus of working toward more sustainable communities.

Permissive settlement area expansion policies and loss of comprehensive planning will promote uncontrolled growth

One of the key elements of the Growth Plan is the requirement for a Municipal Comprehensive Review (MCR), when potential settlement area expansions are evaluated to support growth forecasts region wide. This regulated the timeframe and parameters to consider if an expansion was required and ensured that development was primarily directed to built up areas, meeting density targets to develop land efficiently and restrain urban sprawl. The proposed PPS removes the MCR requirement, allowing municipalities to identify settlement area expansions on an ad hoc basis with relaxed requirements. In addition, policies restricting expansion of Greenbelt and Oak Ridges Moraine settlement areas currently found in the Growth Plan have not been carried forward in the proposed PPS, potentially permitting uncontrolled expansion of these areas.

Proposed PPS allows additional housing in agricultural areas diminishing previous protection from development

Up to three residences are permitted on a prime agricultural lot, one for the primary dwelling and up to two additional residential units with limited tests for compatibility. The proposed PPS also allows multi-lot development where servicing, including private servicing, can be provided. The result of these policies is the loss of land for agricultural use, and housing that is located further from amenities and services, exacerbating car dependence. It also changes the nature of rural landscapes in Ontario, diminishing previous policies that protected these areas for agricultural activities.

Continued changes in Provincial direction may delay finalization of local Official Plans and impact building housing faster

The proposed PPS is anticipated to be in effect in fall 2023 with the expectation that municipalities will follow their normal Official Plan update cycle of every 5-10 years to align with the PPS. With the approval of the York Region Official Plan in November 2022, local municipalities are at various stages of their own local municipal Official Plan review for conformity. Now that Provincial policy approach is changing, local municipalities may choose to pause local Official Plan reviews until the PPS is approved by the Province which will further delay Official Plan reviews. The forthcoming PPS may also delay development application review as staff works to understand and apply the new policies, once approved, for both residential and employment areas.

Environmental assessment modernization is needed to ensure servicing capacity is available to support the Provincial housing target

Developing infrastructure required to support growth has been challenging for York Region due to delays experienced in the environmental assessment process. Many of the Region's major infrastructure projects have been subject to significant delays, including the Southeast Collector with a delay of eight years and both the Duffin Creek Outfall and Upper York Sewage Solutions projects experiencing delays of 10 years.

A streamlined environmental assessment process for municipal infrastructure is required. York Region urges the province to work with municipalities to develop and implement a modernized environmental assessment process that addresses these issues and roll out a new system in the near future. The Province will not meet its 1.5 million home goal with the currently constrained process for approving critical infrastructure under the *Environmental Assessment Act*.

Broadening of housing options and locations may have implications for servicing and infrastructure planning guided by Official Plans for the past 30 years

The proposed PPS expands the definition of housing options to include examples such as garden suites, low and mid-rise apartments, student housing and long-term care homes. Residential intensification also is expanded to include conversion of commercial or industrial buildings, housing redevelopment at higher units, not restricting intensification to specific areas in a municipality as was done in Official Plans, but rather allowing it more broadly. This has implications on Regional infrastructure and services available to support a potential increase in housing not focused in areas previously identified which informed master plans.

The Region looks forward to continuing to work with the Provincial Land Use Plans Branch and staff are available to discuss these comments. If you have any questions, please do not hesitate to contact Sandra Malcic, Director Long Range Planning at 1-877-464-9675, ext. 75274.

Sincerely,

Paul Freeman, MCIP, RPP
Chief Planner

cc: Wayne Emmerson, Regional Chairman and CEO
Lina Bigioni, Chief of Staff
Bruce Macgregor, Chief Administrative Officer
Christopher Rayner, Regional Clerk

York Region Comments on Proposed Provincial Planning Statement

ERO posting #019-6813

Chapter	Regional Comments
General Comments	<ul style="list-style-type: none"> • Planning for high growth areas like the GGH requires a distinct, comprehensive planning framework separate from the rest of the Province. Loss of this comprehensive planning framework makes it difficult for all levels of government to plan for sustainable and financially responsible land use, infrastructure, and services. A regional growth management approach that is integrated with infrastructure planning and financial planning has proven to be successful over the last few decades in using land more efficiently, by encouraging more compact, complete communities reducing sprawl. This was the basis of the Growth Plan that is lost in the proposed Provincial Planning Statement.
Chapter 1	<ul style="list-style-type: none"> • Maintaining a focus on intensification and complete communities promotes walking and transit use which is critical in the prevention of chronic illnesses and the promotion of health and well-being for Ontarians. The relationship between health and the built and natural environment needs to be explained and strengthened. Recommend including references to the importance of efficient land use and development patterns to support human health and well-being. • Land use planning systems impact climate change mitigation and adaptation, including climate-related health risks and hazards. Climate change adaptation, mitigation, vulnerabilities, and increased resiliency should be reflected in PPS 2023 reflecting their importance. Public Health agencies should be included in the list of government agencies working to help identify and address health hazards associated with climate change.
Section 2.2 Housing	<ul style="list-style-type: none"> • Conversion of existing commercial buildings for residential use can cause long-term economic implications for job growth and erode employment areas, especially those primarily comprised of office uses. Recommend that local municipalities be given flexibility to identify areas appropriate for residential conversion rather than permitting that conversion as of right for all existing commercial and institutional uses. (Policy 2.2.1 b) • Recommend that Policy 2.2.1 d) explicitly identify the need for vertical integration of land uses to support affordable housing, community facilities, office and retail, which optimizes the long-term investments of major transit infrastructure. • A common definition of affordable housing, targets, and planning tools to enforce them, are required to continue to strive for improvement and to monitoring progress. Recommend they be maintained.

Chapter	Regional Comments
	<ul style="list-style-type: none"> Policy 2.2.1 a) in the proposed Provincial Planning Statement says that “to address the full range of housing options, including housing affordability needs, planning authorities are required to coordinate land use planning and planning for housing with Service Managers” and the explicit reference to housing and homelessness plans has been removed. Additional clarity is required to confirm to what extent this direction differs from what is in the current Provincial Policy Statement?
<p>Section 2.3</p> <p>Settlement Areas and Settlement Area Boundary Expansions</p>	<ul style="list-style-type: none"> The removal of municipal comprehensive reviews, specific targets for intensification in delineated built up areas, density targets for communities, and less stringent criteria for urban expansions and employment conversions as proposed in PPS 2023 makes planning comprehensively for infrastructure and services more complex, especially where regional coordination of infrastructure and services that cross municipal boundaries is required. The Proposed Planning Statement introduces policies for a subset of municipalities identified as large and fast-growing. This creates an imbalance amongst adjacent municipalities, as some may choose different density targets that will result in land use inefficiencies, different built form, and varying decisions about growth from one municipality to another. The comprehensive planning from the Growth Plan for the GGH is lost with a new patchwork approach to select areas in the Province in the proposed PPS. Policies should require the coordination of development with the delivery of infrastructure. This approach ensures that municipalities can proactively and strategically plan infrastructure in a financially responsible manner. More dispersed residential growth may impact the paramedic services Master Plan. Additional growth will result in increased and spatially dispersed 911 call volumes, which will require more staffing fleet and stations, beyond what is included in the master plan.
<p>Sections 2.5 and 2.6</p> <p>Rural Areas and Lands</p>	<ul style="list-style-type: none"> Reintroduce policies identifying rural settlement areas as the focus of growth and development and ensuring development is compatible with rural landscape. Consider further qualifying policy that permits multi-lot residential development in rural areas by adding “where permitted by Provincial Plans”
<p>Section 2.8</p>	<ul style="list-style-type: none"> The proposed Employment Areas policy 2.8.2, definition is too narrow. The type of employment varies considerably from one municipality to another. For example, the City of Vaughan has key strengths in manufacturing, transportation, warehousing, and logistics, while the cities of Richmond Hill and Markham have a stronger focus on technology related professions such as

Chapter	Regional Comments
Supporting a Modern Economy	<p>professional, scientific and technical services, while the Town of Newmarket has strengths in health care.</p> <ul style="list-style-type: none"> • Changing the definition of employment area may result in the loss of designated employment areas across the Region and may result in the conversion of areas for residential uses. This is especially true for employment areas identified as business parks and primarily comprised of, and planned for, office uses. As with more traditional employment lands, office uses need to be protected long term without directly competing with residential uses. Municipalities should be given discretion to identify and protect employment areas with existing office clusters that would be negatively impacted by the introduction of residential uses. • Comprehensive planning and protection of employment lands for a variety of sectors on a region wide scale aligned with regional investment in water and wastewater infrastructure, transit, and economic development initiatives is key in supporting job growth and attracting and retaining businesses to the Region's employment lands. • Policy 2.8.2.4, which allows Planning authorities to remove lands from employment areas, may have unintended consequences with a cumulative impact on the erosion of employment areas. There are regionally significant employment areas that cross municipal boundaries. Removal of employment lands requires comprehensive consideration to protect the interest of a broader business community and economic viability. • Include more specific policy guidance in this section on land use compatibility with nearby sensitive uses to ensure major facilities and sensitive land uses are planned and developed to avoid, minimize, and mitigate potential adverse effects from odour, noise, air pollutants and other contaminants, and minimize risk to public health and safety.
Section 2.9 Energy Conservation, Air Quality and Climate Change	<ul style="list-style-type: none"> • Integrating climate change considerations into planning and building compact, complete mixed-use communities that include sufficient parks, green space and tree cover helps to support climate change mitigation and adaptation as it encourages healthy, active, and sustainable modes of transportation (e.g., walking, cycling and public transit) while reducing traffic related air pollution and greenhouse gas emissions. Planning for more resilient communities and infrastructure that are adaptive to the impacts of a changing climate and moving towards environmental sustainability ensures communities are more resilient to the impacts of a changing climate and helps to further recognize climate change vulnerabilities that impact public health while supporting the health and well-being of residents.

Chapter	Regional Comments
	<ul style="list-style-type: none"> Update policy 2.9 to identify the need to incorporate climate science including provincial and local climate vulnerability assessments in preparing for the impacts of a changing climate through land use planning decisions.
Section 3.1 General Policies for Infrastructure	<ul style="list-style-type: none"> Requirements to ensure viability of infrastructure over its lifecycle in 3.1(1)a is critical and needs to remain clearly called out. Infrastructure takes time to plan and build, it is recommended that the PPS direct proponents to develop in areas with servicing or servicing is planned, whenever possible, as outlined in the municipality's Master Plans. Private servicing should be a last resort, subject to adequate tests with adequate measures to address potential liability.
Section 3.5 Land Use Compatibility	<ul style="list-style-type: none"> As a major contaminant of concern for Ontarians, this section should be updated to identify air pollutants in the list of potential adverse impacts when evaluating land use compatibility. Reinstate the policy requirement for the proponent of sensitive land uses to demonstrate the need or evaluate alternative locations for sensitive land uses where avoidance of adverse effects is not possible as well as the policy reference to adverse effects to the proposed sensitive land use being minimized and mitigated. Recommend strengthening policy to improve public health protective measures by requiring appropriate separations where necessary. Health impact assessments can be an objective and consistent method for assessing the public health impacts of planned development projects. This practice should be encouraged from the Provincial level, while ensuring that municipalities have the flexibility to adopt their own definitions and processes for health impact assessment.
Section 3.6 Sewage, Water and Stormwater	<ul style="list-style-type: none"> New terminology was introduced for water and wastewater services for decentralized systems, a definition of what would be considered a decentralized system should be included in the Provincial Planning Statement to provide clarity. With greater support for private systems, including communal systems, the Province should play a role in assuming liability

Chapter	Regional Comments
Section 3.9 Public Spaces, Recreation, Parks, Trails and Open Space	<ul style="list-style-type: none"> Recommend including a need to balance requirements for increasing housing density with requirements with expanding publicly available parkland and green space. Public spaces, recreation, parks, trails, and open spaces are important areas that contribute to overall health and well-being. These areas enhance both physical and mental health and are also important for climate change mitigation and adaptation. Most notably in higher density areas, ensuring equitable access to green space and opportunities for recreation, physical activity, socialization, and relaxation are critical in the development of healthy, complete communities.
Chapter 5.0 Protecting Public Health and Safety	<ul style="list-style-type: none"> This Chapter includes policies to direct development away from areas of natural or human-made hazards, and acknowledges that the Province, planning authorities and conservation authorities must work together to mitigate potential risks including the risks associated with a changing climate. York Region recommends expanding this policy direction for “public health and safety” to include climate-related health risks of natural hazards beyond flooding. These include extreme weather events, extreme heat, extreme windstorms, drought and wildfires.

Specific responses / input to focused questions provided in ERO posting #019-6813.

Question	Comment and response table
<p>What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?</p>	<p>Natural Heritage and environmental protection are at risk with recent changes and implementation of Bill 23, particularly the diminished role of Conservation Authorities in natural heritage review. Streamlined planning policy changes required to increase housing supply should not come at the expense of adequate environmental protection or public health and safety.</p> <p>The Provincial Planning Statement should continue to prevent or limit encroachment on natural and agricultural systems from urban development.</p>
<p>What are your thoughts on the proposed policies regarding planning for employment?</p>	<p>A lot of work and collaboration went into identifying Employment Areas in the York Region Official Plan. There are constant pressures for conversion/ more non-employment uses in these areas and the proposed changes further risk adequate long-term protection.</p>
<p>Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?</p>	<p>High-quality, complete application submissions and resubmissions for development proposed that are in keeping with approved municipal planning documents. Timely, complete resubmission that address review comments.</p> <p>Residential applications need to focus on providing housing types that address the housing affordability crisis.</p> <p>The Province to provide much-needed infrastructure for existing built-up and identified growth areas in a timely manner to support increased housing supply in these areas.</p>