Attachment 1

Detailed Staff Comments on the Proposed Changes to the 2014 Provincial Policy

Policy Number*	Rationale	Recommendation
Part I: Preamble		
Paragraph 2	While the current Vision makes reference to health and healthy communities, the references primarily pertain to minimizing risk to public health and safety and do not clearly emphasize the importance of the relationship between health and the built environment.	Recommend that the policy should be modified as follows: "The Provincial Policy Statement promotes healthy communities and provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural and built environment. The Provincial Policy Statement supports improved land use planning and management, which contributes to a more effective and efficient land use planning system."
Part III: How to R	ead the Provincial Policy Statement	
Relationship with Provincial Plans	Support additional wording about the interaction between the Provincial Policy Statement and the other Provincial Plans.	
Part IV: Vision for	Ontario's Land Use Planning System	
Paragraph 6	The inclusion of recreational examples is unnecessary and excludes other opportunities such as cultural learning at archaeological sites, boating, camping, bird watching, photography, etc.	Recommended that the paragraph be modified as follows: "The Province must ensure that its resources are managed in a sustainable way to conserve biodiversity, protect essential ecological processes, promote and public health and safety, provide for the production of food and fibre, minimize environmental and social impacts, provide for recreational opportunities (e.g. fishing, hunting and hiking) and meet its long-term needs"

^{*} Policy numbers are based on the proposed policy number, unless otherwise stated.

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Section 1.0: Build	ling Strong Healthy Communities	
1.1.1b	 York Region staff suggest that a market-based approach to housing may have unintended consequences, including: hindering the provision of affordable, age-friendly and purpose built rental housing. Historically, market-based trends in York Region show tremendous demand for housing patterns that are not affordable to a large portion of York Region residents. development outpacing the provision of new infrastructure. an emphasis on market demand for increasing settlement areas may lead to increased capital investment and ongoing costs for infrastructure and/or inefficient use of infrastructure. not addressing anticipated demographics and economic shifts. 	Recommended that the market demand should be a lens through which growth management decisions are assessed, not the only factor, to ensure an appropriate range and mix of housing is provided.
	It is also unclear how a market-based approach correlates with the Growth Plan's targets which are meant to influence market demand to provide certain housing types in certain places.	
	Market demand is one of many factors that should be considered in ensuring appropriate range and mix of housing. Other key considerations include demographics, economy, and housing targets. York Region staff interprets a market-based approach to be a comprehensive look at the housing market, including the existing supply, demographic shifts, market demand and future trends.	
	A definition, which recognizes that market demand is one of the lenses through which growth management decisions are assessed, would aid in the interpretation and implementation of a market-based approach.	
1.1.1e	Staff are supportive of emphasizing the integration of land use planning with transit investment, growth management, development, and infrastructure planning. This integrated approach will also reduce transportation and energy demands.	Recommend that the policy be modified as follows: "minimize land consumption, transportation, energy and servicing costs;"

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1.1.1f	Staff do not support the removal of "identify, prevent, and remove" as they are more specific and trigger an action in the development process. "Addressing" leaves this more open to interpretation and may be given lower priority to other competing planning issues.	Recommend that the policy retain "identifying, preventing, and removing." Recommend that the policy be further modified as follows:
	Accessibility is a universal aspect of a complete community, providing access, not only to persons with disabilities, but also strollers, elderly and children.	"improving universal accessibility for all persons with disabilities by identifying, preventing and removing addressing land use barriers which restrict their full participation in society;"
1.1.2	Lengthening the planning horizon from 20 to 25 years is consistent with the Growth Plan which has been recently amended to lengthen the planning horizon to 2041. A longer planning horizon will help facilitate long-term infrastructure planning. Timely Provincial approval of critical infrastructure is essential to ensure that land supply can be adequately serviced and meet growth expectations and housing supply objectives. Parts of York Region's designated land supply approved by the Province in the 2010 Regional Official Plan is still constrained by water and wastewater servicing needs, primarily due to outstanding environmental assessment approvals by the Province.	Recommend the Province provide timely approval of critical infrastructure to facilitate a 25 year land supply.
1.1.3.2c	Water quality is a key contributor to the quality of communities, both adjacent to water source and downstream, and should be included as a factor considered to determine land use patterns.	Recommend that the policy be modified as follows: c) "minimize negative impacts to air and water quality and climate change, and promote energy efficiency;"
1.1.3.6	Staff do not support weakening of this policy. Designated growth areas should be required to be developed in a compact form with a mix of uses and density. However, staff recognize the PPS applies Province-wide and the scale of compact form and mix of uses and density must be appropriate to the local context. This policy should	Recommend that the policy retain the original "shall."

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	remain strong to make efficient use of investments in transit and infrastructure and continue to protect our natural heritage system and agricultural land.	
1.1.3.7	Strong phasing policies are essential to ensure the timing of infrastructure and public service facilities in designated growth areas. If development is able outpace infrastructure delivery, critical issues may arise, such as increase traffic congestion and low water pressure. The proposed changes diminish the strength and significance of this policy.	Recommend that the policy retain the original "shall."
1.1.3.8	Market demand is a subjective term and should be clarified. Market demand should be one consideration when municipalities identify "sufficient opportunities to accommodate growth" in conjunction with other growth management objectives and infrastructure requirements. Staff support the added text in sub-point e) which seeks to avoid impacts, as well as the retention of minimum distance separation in sub-point d). Staff request clarification that 1.1.3.8e) still refers to the most appropriate direction (geography) for expansion. Recommend that this policy should still "have regard for or apply the policies of Section 2 and 3" — as was stated in the 2014 PPS.	Recommend that the proposed addition of satisfying market demand be clarified and identify market demand as one of many considerations to provide sufficient development opportunities. Recommend sub-point e) be revised to clarify that the policy continues to refer to the most appropriate geographic direction for expansion.
1.1.3.9	York Region staff does not support settlement area boundary adjustment outside of a municipal comprehensive review. Proposed changes have the potential to impact population and employment growth outside of a municipal comprehensive review process, which has the potential to impact the alignment between land use and infrastructure planning.	Recommended that this be removed or modified to only permit this in exceptional circumstances that are based on clear criteria.
1.1.4.1	Rural communities policies should include protection and promotion	Recommend that the policy be added as

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	of greenspace to support climate change mitigation and adaptation.	follows:
		"j) protect and promote greenspace to support
		climate change mitigation and adaptation"
1.2.1	York Region staff supports the integration of infrastructure with	
	growth management. The proposed change will support York	
	Region's Water and Wastewater Master Plans and growth	
	management objectives.	
1.2.2	York Region staff actively engages with indigenous communities.	Recommend that the policy be revised to
	However, there is no limitation within the policy on whom	require engagement with indigenous
	municipalities are required to engage with. The Ministry of	communities that hold or have validly asserted
	Environment, Conservation and Parks provides direction to	treaty or aboriginal rights that may be affected
	proponents on which communities to engage when undertaking	by the land use planning matter. Alternatively,
	environmental assessments. Similar direction would be beneficial	the Ministry of Municipal Affairs and Housing
	for engaging with indigenous communities on land use planning	should provide direction on what Indigenous
	matters.	communities should be engaged as part of the
		planning matter.
1.2.4a	Coordination with local municipalities is essential for integrated and	Recommend that the policy be modified as
	collaborative land use planning. Consultation regarding the	follows:
	allocation of population, housing, and employment projections is	"a) identify, <u>coordinate</u> and allocate
	not enough to comprehensively plan for long-term regional growth.	population, housing and employment
		projections for lower-tier municipalities.
		Allocations and projections by upper tier
		municipalities shall be based on and reflect
		provincial plans where these exist and are
		informed by provincial guidelines;"
1.2.4b	In keeping with other policies in the Provincial Policy Statement,	Recommend that the policy be modified as
1.2.4d	growth and development should be directed to area with existing or	follows:
	planning transit corridors.	"b) identify areas where growth or
		development will be directed, including the
	Increased density along major transit corridors may be	identification of nodes and the existing and
	inappropriate where stations do not exist or are not planned for	future transit corridors linking these nodes;

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	(e.g. between GO railways). Reference to major transit corridors	d) where major transit corridors exist or are to
	should match the Growth Plan by rephrasing to major transit	be developed, identify density targets for areas
	stations, where increased density is more appropriate.	adjacent or in proximity to these corridors and
		major transit stations, including minimum
		targets that should be met before expansion of
		the boundaries of settlement areas is permitted
		in accordance with policy 1.1.3.8; and"
1.2.6.1	Staff do not support the removal of referencing design, buffers, and separation as methods to minimize and/or mitigate adverse	Recommend that the policy be modified as follows:
	impacts.	"Major facilities and sensitive land uses shall be
		planned and developed to avoid, or if
		avoidance is not possible, minimize and
		mitigate any potential adverse effects from air
		pollution, odour, noise and other
		contaminants, minimize risk to public health
		and safety, and to ensure the long-term
		operational and economic viability of major
		facilities by appropriate design, buffers and/or
		separation from each other in accordance with
		provincial guidelines, standards and
		procedures."
1.2.6.2	There have been many instances where major facility operators	Staff recommend that planning policies ensure
	have experienced issues with the long term operation, maintenance	effective separation of sensitive land uses from
	and expansion of major facilities (e.g. water and wastewater and	incompatible major facilities, such as water and
	waste facilities) where sensitive land uses are located in close	wastewater facilities.
	proximity. This can represent a significant barrier to expansion of	
	existing facilities, which may be required to provide the servicing	

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	capacity to support additional housing capacity and/or job creation.	
1.3.1	Clarity is needed that the addition of "mixed use" does not imply residential mixed use is permitted in employment areas. Residential uses, of any kind, should not be permitted in employment areas. If the added mixed use refers to a mix of employment uses, then it is a duplication and can be removed.	Recommend that the policy be modified as follows: "a) providing for an appropriate mix and range of employment and institutional uses, and mixed uses to meet long-term needs, where appropriate;"
	Clarity is also needed on what is meant by "identifying strategic sites for investment." Does this mean Provincially Significant Employment Zones, regionally significant employment areas referenced in policy 1.3.2.5, or specific parcels? A definition of "strategic site for investment" would aid in interpretation.	Recommend defining "strategic sites for investment".
1.3.2.2	As per Growth Plan policy 2.2.5.6, both upper and single tier municipalities will designate employment areas in official plans. The link between the first and second paragraphs is unclear and should refer to all employment areas to be consistent with the PPS definition of employment.	Recommend that the policy be modified as follows: "At the time of the official plan review or update, planning authorities should assess employment areas identified in local plans."
	The proposed new paragraph implies that there are certain employment areas planned only for industrial and manufacturing and should be treated differently. This is contrary to the PPS definition of employment areas, which states employment areas should provide a mix and range of employment uses.	Recommend that the second paragraph be a standalone policy and be revised to refer to all employment areas. Recommended that the policies be modified to refer to all employment areas.
1.3.2.3	This policy implies that there are certain employment areas planned only for industrial and manufacturing and should be treated differently.	Recommend the policy be revised to refer to all employment areas. Recommend that reference to residential uses,
	This policy also implies that residential uses are ancillary uses to employment areas and are permitted within employment areas.	including residential institutional uses, within any employment area be removed.

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	Residential uses, including intuitional residential uses, such as long-	
	term care facilities, are not appropriate in employment areas and	
	are contrary to other policies within the PPS and Growth Plan.	
1.3.2.5	Employment area conversions occurring outside of an MCR are of	If conversions are supported outside of an
	concern. At minimum the wording should mirror the conversion	MCR, staff recommend limiting to a one-time
	policies in the Growth Plan, including the one-time opportunity for	opportunity for conversion with associated
	conversion and criteria to convert. It is also recommended that	criteria to convert employment land.
	criteria be added to provide clarity regarding if all or only certain	
	types of conversion requests could be considered outside of a MCR.	Recommend the addition of criteria to identify
		what types of conversion requests could be
	As written, the policy states that conversions cannot occur outside	considered outside of a municipal
	of an MCR within Provincially significant employment zones or	comprehensive review.
	regionally significant employment areas. Regional staff are	
	supportive of the flexibility to identify regionally significant	Recommend the policy be revised to clarify
	employment areas specific to local context as this is supportive of	what regionally significant employment areas
	Provincial objectives to support the long term protection of	are. It should also clearly state that upper- and
	employment areas. However, clarification is needed for regionally	single-tier municipalities identify regionally
	significant employment areas, including:	significant employment areas.
	1. A definition of regionally significant employment areas.	
	2. Confirmation of who identifies them, as it is unclear what a	Recommend the addition of the following
	regional economic development corporation is. Regionally	definition:
	significant employment areas should only be identified by	"Regionally significant employment area:
	upper- or single- tier municipalities who service the long	Employment areas that have long-term
	term public interest.	regional interest for reasons including, but not
	3. Clarification on how they differ from Provincially significant	limited to:
	employment zones.	a. their location near infrastructure for major
	4. Confirmation that they are to be designated in Regional and	transportation or goods movement;
	upper-tier Official Plans, as referred to in policy 2.2.5.6 of	b. their strategic role and/or economic impact
	the Growth Plan.	to the region;
		c. the presence of high concentrations of
		employment, business clusters or nodes;
		and
		d. the availability of a large quantum of

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1.4.1	It is unclear how housing "types" (e.g. 1.1.1 & 1.3.2.b.2), "options" (e.g. 1.4.1 & 1.4.2), and "forms of" differs from each other	vacant employment land supply with the potential to support future job growth. Regionally significant employment areas include provincially significant employment zones as well as area outside of provincially significant employment zones." Recommend consistency by only using the defined "housing options" terminology, which
	throughout the PPS. The newly added paragraph is unnecessary since the policy states that 3 years is a minimum requirement. Therefore a municipality may maintain a land supply to provide growth for any length of time longer than 3 years.	includes housing types, throughout the Provincial Policy Statement. Recommend removing proposed additional paragraph.
1.4.3	"Special needs" in b.1 is an outdated term and should be updated. See comment associated with policy 1.1.1.b regarding market-based needs.	Recommend that the policy be modified as follows: "b) permitting and facilitating: 1. all housing options required to meet the social, health, economic and well-being requirements of all current and future residents, including special needs requirements the needs of vulnerable populations and needs arising from demographic changes and employment opportunities, including opportunities to age in place; and"
1.6.1	There are environmental assessment requirements and asset management requirements to ensure that infrastructure considers future impacts of climate change. Staff recommend that the Province use wording that indicates the infrastructure systems can adapt to a changing climate.	Recommend that the policy be modified as follows: "Infrastructure and public service facilities shall be provided in an efficient manner that prepares for and adapts to the impacts of a

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		changing climate while accommodating projected needs"
1.6.2	Renewable energy should be referenced to support green infrastructure and mitigation of climate change.	Recommend that the policy be modified as follows: "Planning authorities should promote green infrastructure and renewable energy to complement infrastructure"
1.6.6.1	The previous wording should be retained to ensure optimized uses of services (i.e. "direct and accommodate"). Growth needs to be staged and directed to existing areas or areas planned for infrastructure to ensure financial sustainability. Staff do not support removing that private communal sewage services must comply with all regulatory requirements. If they are not required to comply with all regulatory requirements, negative effects could be observed on the environment, human health, and the economy, as the current regulations state. Municipalities need additional support materials that aid in the cost-benefit analysis needed to determine the optimum density related to infrastructure investment.	Recommend that the policy be modified as follows: "Planning for sewage and water services shall: a) direct and accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing: 1. municipal sewage services and municipal water services; and 2. private communal sewage services and private communal water services, where municipal sewage services and municipal water services are not available or feasible; b) ensure that these systems are provided in a manner that: 1. can be sustained by the water resources upon which such services rely; 2. prepares for the impacts of a changing climate; 3. is feasible, and financially viable over their lifecycle and complies with all regulatory requirements; and"

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1.6.6.3	York Region has a comprehensive program to provide York Region residents high quality water and wastewater services that achieve very high quality standards. In areas where municipal water and wastewater services are not available, the proposed policy change is likely to result in greater instances of private communal water and wastewater services. In aligning infrastructure and land use planning, growth is directed to areas with existing or planned municipal water and wastewater services, except in rare and unique circumstances.	It is recommended that PPS policy reinforce the benefits of Ontarians receiving high quality and safe water and wastewater services, only permitting private or communal water/wastewater servicing in rare and unique circumstances.
1.6.6.4	The reference to 'no negative impacts' is not appropriate in this policy, as there will always be some negative impacts to septic systems. It would be more appropriate to reference the Ontario Building Code. Clarity is needed for "feasible." This term is subjective and could lead to differing interpretations. It is recommended that "feasible" be defined with clear criteria for what would be considered "feasible" to provide greater certainty for both municipalities and developers. The word 'only' should be kept to ensure that individual on-site sewage services and water services are limited and only for infilling and minor rounding of existing development. Additional clarification is needed on the level of assessment the policy encourages. Staff are concerned about the scale and difficulty of undertaking this assessment. Due to the nature of individual onsite wastewater servicing (septic systems) it is difficult to identify impacts directly. Unless there is obvious signs of failure, extensive tracer studies would likely be required; however, historically tracer	Recommend that the policy be modified as follows: "Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision in accordance with the Ontario Building Code of such services with no negative impacts. In settlement areas, individual on-site sewage services and individual on-site water services may only be used for infilling and minor rounding out of existing development." Recommend the second paragraph be removed. Alternatively, further clarification on the scale of the assessment is required.
1.6.6.7	studies have had limited success identifying failures. Staff support the principle of an integrated and holistic planning process but have concern with the addition of stormwater to water	Recommend that the policy be modified as follows:
	and wastewater planning due to jurisdictional issues in two-tier	Planning for stormwater management shall:

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	municipalities. Currently, stormwater is a local municipal	a) in single-tier municipalities, be integrated
	responsibility under the Municipal Act, 2001, whereas water and	with planning for sewage and water services
	wastewater are generally upper-tier requirements. It is	and ensure that systems are optimized, feasible
	recommended that this section be revised to state that this clause	and financially viable over the long term;
	only applies to single-tier municipalities.	b) minimize, or, where possible, prevent
		increases in contaminant loads;
	Staff support the inclusion of preparing for climate change.	c) minimize erosion and changes in water
	However, as written the policy is circular: "Stormwater management	balance, and prepare for the impacts of a
	shallprepare for the impacts of climate change through the	changing address future climate conditions
	effective management of stormwater."	through the effective management of
		stormwater
	Staff are opposed to changing the language from not increasing risks	d) mitigate minimize risks to human health,
	to human health, safety, and property, to "mitigate" these risks. This	safety, property and the environment;
	would appear to allow leeway to increase risks to human health,	e) maximize the extent and function of
	safety, and property. This is not recommended.	vegetative and pervious surfaces; and
		f) promote ensure stormwater management
	The use of stormwater management best practices should be	best practices, including source control,
	ensured, not only promoted. Green infrastructure, source control	stormwater attenuation and re-use, water
	and maintaining hydrologic regime should also be identified as a	conservation and efficiency, green
	stormwater management best practice.	<u>infrastructure</u> , and low impact development,
		and maintaining the hydrologic regime.
1.6.7.1	The Provincial Policy Statement should explicitly acknowledge the	Recommended that the policy be modified as
	fundamental importance of accessibility and include it as an	follows:
	important feature of community elements. The Provincial Policy	"Transportation systems should be provided
	Statement should also reinforce the importance of human health,	which are safe, <u>accessible</u> , energy efficient,
	especially due to the impact that transportation issues have on air	facilitate the movement of people and goods,
	quality.	minimize human health impacts from air
		pollution in accordance with regulatory
		standards and are appropriate to address
		projected needs."
1.6.7.1	Staff are concerned that language has been softened from "shall" to	Recommended that the policy be modified as
	"should" with regards to efficient usage of existing and planned	follows:
	infrastructure. The use of "shall" is consistent with other policies in	"Efficient use shall should be made of existing

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	the Provincial Policy Statement that seek cost-efficient	and planned infrastructure, including through
	infrastructure planning (1.1.1.e).	the use of transportation demand management
		strategies <u>and complete street best practices</u> ,
	Complete street best practices can also be used to increase the	where feasible."
	efficiency of existing and planning transportation infrastructure.	
1.6.7.3	Staff suggest a note be added regarding fare/service integration	Recommended that the policy be modified as
	between transportation systems to improve connectivity and	follows:
	seamlessness of travel. This would help improve inter-regional	"As part of a multimodal transportation system,
	transit service, encourage increase ridership, and result in a better	connectivity within and among transportation
I	return on transit infrastructure costs.	systems and modes should be maintained and,
		where possible, improved including
I		connections which cross jurisdictional boundaries, and fare and service integration."
1.6.7.4	A grid network land use pattern should be prioritized to maximize	Recommend that the policy be modified as
1.0.7.4	efficiency of operating transportation systems. This policy can	follows:
	provide additional guidance on the hierarchy of transportation, as	"A grid network land use pattern, density and
	single occupancy vehicle trips should be the top priority for	mix of uses should be promoted that minimize
	reduction.	the length and number of vehicle trips,
		particularly single occupancy vehicle trips, and
		support current and future use of transit and
		active transportation."
1.6.7.5 (from	This policy is critical for the building of strong, healthy, complete	Recommend that the policy be reinstated.
the original	communities that transportation and land use considerations be	
2014 PPS,	integrated at all stages of the planning process.	
proposed to be		
delete)		
1.6.8.1	To ensure municipalities can effectively plan for all modes of	Recommend that the policy be modified as
	transportation, additional details are required on corridors. Active	follows:
	transportation corridors should also be specifically supported by this	"Planning authorities shall plan for and protect
	policy to ensure key active transportation routes area planned and	<u>at-grade and subterranean</u> corridors and rights-
	protected, including within the right-of-way and separated multi-use	of-way for transportation, transit, active
	trail corridors.	transportation and infrastructure facilities to
		meet current and projected needs."

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	Subterranean corridors should also be planned and protected for	
	underground utility and transportation corridor or tunnels.	
1.6.8.4	This policy should be expanded to include unopened road	Recommend the policy be modified as follows:
	allowances to allow for effective support of continuous linear	"The preservation and reuse of abandoned
	corridors. This policy should be strengthened by removing	corridors, and unopened road allowances for
	"wherever feasible".	purposes that maintain the corridor's integrity
		and continuous linear characteristics should be
		encouraged , wherever feasible ."
1.6.8.5	Staff support the addition of this policy, however additional clarity	Recommend that "co-location" be clarified.
	should be provided to define what co-location means, what types of	
	infrastructure this is in reference to, and the relationship between	
	transportation corridors and other infrastructure corridors (e.g.	
	water and wastewater mains, transmission lines and pipelines).	
1.6.10.1	The removal of considering the implications of land use patterns on	Recommend that the policy be modified as
	waste generation, management, and diversion should not be	follows:
	removed. It is counter to developing sustainable communities.	"Waste management systems need to be
		provided that are of an appropriate size and
	The Provincial Policy Statements should also speak to all four tools	type to accommodate present and future
	for waste management through the addition of "recover". Directives should be included that address waste minimization and the	requirements, and facilitate, encourage and
		promote reduction, reuse, and recycling and
	progression towards a zero waste society.	recovery objectives as a progression towards a zero waste society. Planning authorities should
		consider the implications of development and
		land use patterns on waste generation,
		management and diversion"
1.7.1	It is unclear what is meant by "community investment-readiness",	Recommend that "community investment
	therefore, additional clarity is needed.	readiness" be clarified.
	Staff are supporting of ansauraging complete communities and	Decembered that this policy he modified as
	Staff are supportive of encouraging complete communities and	Recommend that this policy be modified as follows:
	provided live work opportunities for residents; however, inclusion of	
	a housing policy in the economic prosperity section raises concerns	"Long-term economic prosperity should be
	of having unintended consequences for increased pressures of	supported by:
	employment area conversions to permit residential uses within	a) promoting opportunities for economic

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	employment areas. It is more appropriate to attach a housing	development, and community investment-
	reference to an existing policy on economic development.	readiness and housing options for a diverse
		workforce and plans for future work patterns
	Staff are supportive of the added wording regarding local food and	b) encouraging residential uses to respond to
	the agri-food network.	dynamic market-based needs and provide
		necessary housing supply and range of housing
	Staff recommend recognizing the human health of nature, including	options for a diverse workforce;
	reducing stress, depression, and high blood pressure.	k) minimizing negative impacts from a changing
		climate and considering the ecological and
		human health benefits provided by nature;"
1.8.1	Staff support the policy changes as they strengthen the policy objectives.	
2.0 Wise Use and	Management of Resources	
2.1.10	York Region is supportive of protecting wetlands beyond those subject to 2.1.4 and 2.1.5. It's difficult to assess what this policy means given the reference to Provincial guidelines.	Recommend that this policy be modified as follows: "Municipalities may choose to manage protect wetlands not subject to policy 2.1.4 and 2.1.5, in accordance with guidelines developed by the Province."
2.3.2	York Region staff supports the added reference to an agricultural system approach, the agri-food network, and associated definitions.	
2.3.3.3	York Region staff does not support the proposed additional text which limits the policy to prime agricultural areas. This policy should continue to refer to new land uses in any agricultural area.	Recommend maintaining the original text.
2.3.6.1	York Region staff does not support the removal of sub-point b)2 regarding minimum distance separation.	Recommend sub-point b)2 be reinstated.
2.3.6.2	York Region staff supports proposed additional text referring to avoiding impacts of non-agricultural uses and provincial guidelines.	
3.0 Protecting Pu	ıblic Health and Safety	1
3.2.3	York Region staff supports the added policy that encourages the reuse of soil.	

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4.0 Implementat	ion and Interpretation	
4.7	Staff are concerned this proposed policy is redundant due to recent changes to the Planning Act to reduce the time permitted to review	Recommend removal of this proposed policy.
	applications which came into effect on September 3, 2019 . It is also unclear what priority applications are.	Recommend pursuing other avenues to streamline the planning and development process.
	 Staff are supportive of other options to help streamline the planning and development process, such as: consolidating Environmental Assessment Act, 1990 and Planning Act, 1990 approvals. simplifying/reducing the complexity of the official plan amendment processes, and increasing alignment between official plans and secondary plans respecting local decision making by restricting the basis of appeals to conformity matters and prohibiting de novo hearings. 	