

## Aguila-Wong, Christine

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**To:** Regional Clerk  
**Subject:** RE: Regional Council Decision - Comments on Proposed Changes to the Provincial Policy Statement

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**From:** Regional Clerk [mailto:ClerkGeneralLine@york.ca]  
**Subject:** Regional Council Decision - Comments on Proposed Changes to the Provincial Policy Statement

On October 17, 2019 Regional Council made the following decision:

1. Council endorse this report and Attachment 1 as the Region's submission to the Province in response to the Environmental Registry of Ontario (ERO) postings #019-0279: Provincial Policy Statement – Proposed Policies.
2. The Regional Clerk forward this report and attachments to the Ministry of Municipal Affairs and Housing and the Clerks of the local municipalities.

The original staff report is attached for your information.

Please contact Sandra Malcic, Director of Long Range Planning at 1-877-464-9675 ext. 75274 if you have any questions with respect to this matter.

Regards,

**Christopher Raynor** | Regional Clerk, Regional Clerk's Office, Corporate Services

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# **The Regional Municipality of York**

Committee of the Whole  
Planning and Economic Development  
October 10, 2019

Report of the Commissioner of Corporate Services and Chief Planner

## **Comments on Proposed Changes to the Provincial Policy Statement**

### **1. Recommendations**

1. Council endorse this report and Attachment 1 as the Region's submission to the Province in response to the Environmental Registry of Ontario (ERO) postings #019-0279: Provincial Policy Statement – Proposed Policies.
2. The Regional Clerk forward this report and attachments to the Ministry of Municipal Affairs and Housing and the Clerks of the local municipalities.

### **2. Summary**

This report provides Council with staff comments on proposed changes to the Provincial Policy Statement (PPS). The PPS provides long-term direction on land use planning matters of Provincial interest. The Province is consulting on proposed policy changes to the PPS to support the government's Housing Supply Action Plan.

#### Key Points:

- Province is proposing changes to the PPS with comments due by October 21, 2019
- While the PPS applies province-wide, proposed changes to incorporate a market-based approach which may conflict with area specific Growth Plan policies and directions, therefore a definition is needed for clarity
- Staff are supportive of the concept of the proposed regionally significant employment areas, but further clarification is required on how they are designated
- A proposed new policy requiring municipalities to fast-track priority development applications is redundant given the new shortened application review timelines prescribed by the Planning Act through Bill 108

### 3. Background

#### **Province is soliciting comments on proposed policy changes to the 2014 Provincial Policy Statement**

The [Provincial Policy Statement \(PPS\), 2014](#) is issued under the [Planning Act](#) and applies province-wide. The PPS provides the foundation for long-term direction on land use planning matters of Provincial interest, including housing, infrastructure, natural resources, agriculture, economic development, transportation, and natural hazards. York Region's Official Plan and all land use planning decisions must be consistent with the PPS. Planning decisions must also conform to Provincial plans, such as the Growth Plan in the Greater Golden Horseshoe.

The Province committed to reviewing the PPS in support of the Housing Supply Action Plan and released proposed changes to the PPS on July 22, 2019. The proposed changes are primarily to revise the wording in the 2014 PPS and are focused on the following objectives:

1. Increase housing supply and mix
2. Protect the environment and public safety
3. Reduce barriers and costs
4. Support rural, northern, and indigenous communities
5. Support certainty and economic growth

The Province remains committed to existing key objectives, including efficient use and management of land and infrastructure, long term protection of agricultural lands and natural resources.

### 4. Analysis

#### **Overall, proposed changes to the Provincial Policy Statement are generally supported**

York Region staff are generally supportive of the proposed changes to the PPS, subject to comments outlined in this report. Staff support changes that clarify the relationship between the PPS and other Provincial plans. This includes increasing the planning horizon from 20 to 25 years, aligning growth management with infrastructure planning, increasing housing supply and encouraging transit-supportive development and intensification to promote economic prosperity. Attachment 1 provides detailed comments on the proposed changes. These comments were informed by internal circulation to Regional departments and consultation with local municipalities.

Comments are to be submitted through the Environmental Registry of Ontario and are due by October 21, 2019.

## **Additional guidance on the relationship between the Provincial Policy Statement and other Provincial Plans is beneficial**

The PPS is to be read together with other Provincial plans that also govern land use decisions, such as the Growth Plan, Greenbelt Plan, and Oak Ridge Moraine Conservation Plan. As proposed, new wording identifies:

1. If the PPS and other more detailed Provincial plans provide similar policy direction, then the more detailed plan takes precedence
2. If they provide different policy direction on a land use matter, both the PPS and Provincial plans must be satisfied

Staff have considered the relationship between the PPS and other Provincial plans when formulating this response, since in some instances there are more detailed Provincial plans that apply in York Region. Staff have also identified where the relationship should be strengthened or clarified as discussed in this report.

Timely approvals of infrastructure becomes even more critical with proposed increase of land supply from 20 to 25-years. Timely approval of critical infrastructure is required to ensure that land supply can be adequately serviced and meet housing supply objectives. Parts of the Region's land supply approved by the Province in the 2010 Regional Official Plan are still constrained by water and wastewater servicing requirements, primarily due to outstanding environmental assessment approvals by the Province. The Province should ensure that critical infrastructure projects are approved in a timely manner to service the proposed 25-years land supply.

## **Clarification on the market-based approach is needed to ensure the Region's ability to provide a full range and mix of housing**

Currently, the PPS, 2014 seeks to accommodate an appropriate range and mix of housing (including affordable options). Proposed changes shift the focus to accommodating an appropriate market-based range and mix of housing. As written, it is unclear what a market-based approach means. York Region staff interpret a market-based approach to be a comprehensive look at the housing market, including the existing supply, demographic shifts, market demand and future trends.

The relationship between the intensification, density and affordability targets in the Growth Plan and the market-based approach proposed in the PPS needs clarification on how they align. It is recommended that the market-based approach be defined to clarify that market demand should be one of the lenses through which growth management decisions are assessed.

## **Proposed changes to allow settlement area boundary expansion to satisfy market demand should be balanced with other growth management objectives and infrastructure requirements**

The Province is proposing a policy change that would allow settlement area boundary expansion to satisfy market demand at the time of a municipal comprehensive review. Satisfying market demand can be subjective, therefore additional clarity is needed. It is recommended that the Province clarify market demand and identify it as one consideration together with other growth management objectives and infrastructure requirements.

## **Strong phasing policies in designated growth areas should be maintained to ensure orderly growth**

The current PPS requires phasing policies for designated growth areas to ensure intensification targets are achieved prior to, or concurrently with, new development in designated growth areas and ensure the timing of infrastructure and public service facilities. The proposed wording changes “require” to “encourage” phasing policies. Phasing policies are essential to the orderly development of designated growth areas to ensure that development does not outpace critical infrastructure delivery. It is recommended that the original wording be maintained to require phasing policies.

## **York Region staff are supportive of regionally significant employment areas, subject to clarification**

Staff are supportive of a new policy that allows for identification of regionally significant employment areas that provides flexibility to reflect local context and would be protected from conversions outside of a municipal comprehensive review, subject to the following clarifications:

1. A definition of regionally significant employment areas
2. Clarification on how they relate to provincially significant employment zones
3. Clarification these area are identified by upper- or single-tier municipalities
4. Confirmation that they are to be designated in Regional or single-tier Official Plans

## **Fast-tracking priority applications may be redundant based on reduced Planning Act timelines introduced through Bill 108**

The Province proposes to add a policy requiring municipalities to identify and fast-track priority development applications that support housing and job-related growth. Staff are concerned this proposed policy is redundant as a result of recent changes to the Planning Act reducing the timeframe for making decisions on development applications.

Staff are supportive of other options to help streamline the planning and development process, including better alignment between official plans and secondary plans and opportunities to significantly reduce the time it takes to develop new secondary plans.

## **Proposed changes to water and wastewater servicing policies could be difficult to implement**

York Region has a comprehensive program to provide York Region residents high quality water and wastewater services that meet high standards. In areas where municipal water and wastewater services are not available the current PPS permits private forms of communal servicing. A proposed change would give preference to private communal forms of servicing, which 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. If the Province moves forward with the proposed policy change, mechanisms should be put in place to ensure public health and safety and financial sustainability of water and wastewater services over the long term.

## **5. Financial**

Work related to the preparation of this report is included within the approved Planning and Economic Development budget. Staff do not anticipate significant foreseeable financial implications to the Region based on the proposed changes to the Provincial Policy Statement. There could be financial implications associated with a market demand approach related to infrastructure and preference of private communal serving proposed by the Province.

## **6. Local Impact**

The proposed changes to the PPS have direct implications for local municipalities. A workshop was held with local municipal planning commissioners and directors, which informed the Region's response.

## **7. Conclusion**

This report has provided a high level summary of the proposed changes to the Provincial Policy Statement and staff's detailed comments in Attachment 1. These comments were informed by internal circulation to Regional departments and in consultation with local municipalities. York Region staff are generally supportive of proposed changes to the PPS, subject to the comments on the proposed changes outlined in this report.

It is recommended that staff submit this report and the attachments to the Province as the formal submission in response to the Environmental Registry of Ontario (ERO) postings #019-0279: PPS – Proposed Policies. Once the PPS changes are finalized, staff will assess the impacts of any further changes to the current Regional municipal comprehensive review process and report back to Council as necessary.

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For more information on this report, please contact Sandra Malcic, Director of Long Range Planning at 1-877-464-9675 ext. 75274. 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

September 26, 2019  
Attachments (1)  
eDOCS # 10022449

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

Policy Number*	Rationale	Recommendation
<b>Part I: Preamble</b>		
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 <a href="#">promotes healthy communities and</a> 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.”
<b>Part III: How to Read the Provincial Policy Statement</b>		
Relationship with Provincial Plans	Support additional wording about the interaction between the Provincial Policy Statement and the other Provincial Plans.	
<b>Part IV: Vision for Ontario's Land Use Planning System</b>		
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, <a href="#">promote</a> <del>and</del> public health and safety, provide for the production of food and fibre, minimize environmental and social impacts, provide for recreational opportunities <del>(e.g. fishing, hunting and hiking)</del> and meet its long-term needs...”

\* Policy numbers are based on the proposed policy number, unless otherwise stated.



Policy Number	Rationale	Recommendation
<b>Section 1.0: Building Strong Healthy Communities</b>		
1.1.1b	<p>York Region staff suggest that a market-based approach to housing may have unintended consequences, including:</p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. development outpacing the provision of new infrastructure.</li> <li>3. an emphasis on market demand for increasing settlement areas may lead to increased capital investment and on-going costs for infrastructure and/or inefficient use of infrastructure.</li> <li>4. not addressing anticipated demographics and economic shifts.</li> </ol> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>
1.1.1e	<p>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.</p>	<p>Recommend that the policy be modified as follows:          "...minimize land consumption, <a href="#">transportation</a>, <a href="#">energy</a> and servicing costs;"</p>

Policy Number	Rationale	Recommendation
1.1.1f	<p>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.</p> <p>Accessibility is a universal aspect of a complete community, providing access, not only to persons with disabilities, but also strollers, elderly and children.</p>	<p>Recommend that the policy retain “identifying, preventing, and removing.”</p> <p>Recommend that the policy be further modified as follows:  “improving <u>universal</u> accessibility for <u>all</u> persons <del>with disabilities</del> by <u>identifying, preventing and removing</u><del>addressing</del> land use barriers which restrict their full participation in society;”</p>
1.1.2	<p>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.</p> <p>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.</p>	<p>Recommend the Province provide timely approval of critical infrastructure to facilitate a 25 year land supply.</p>
1.1.3.2c	<p>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.</p>	<p>Recommend that the policy be modified as follows:  c) “minimize negative impacts to air <u>and water</u> quality and climate change, and promote energy efficiency;”</p>
1.1.3.6	<p>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</p>	<p>Recommend that the policy retain the original “shall.”</p>

Policy Number	Rationale	Recommendation
	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	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Recommend sub-point e) be revised to clarify that the policy continues to refer to the most appropriate geographic direction for expansion.</p>
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

Policy Number	Rationale	Recommendation
	of greenspace to support climate change mitigation and adaptation.	follows: <a href="#">“j) protect and promote greenspace to support climate change mitigation and adaptation”</a>
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. However, there is no limitation within the policy on whom municipalities are required to engage with. The Ministry of Environment, Conservation and Parks provides direction to proponents on which communities to engage when undertaking environmental assessments. Similar direction would be beneficial for engaging with indigenous communities on land use planning matters.	Recommend that the policy be revised to require engagement with indigenous communities that hold or have validly asserted treaty or aboriginal rights that may be affected by the land use planning matter. Alternatively, the Ministry of Municipal Affairs and Housing should provide direction on what Indigenous communities should be engaged as part of the planning matter.
1.2.4a	Coordination with local municipalities is essential for integrated and collaborative land use planning. Consultation regarding the allocation of population, housing, and employment projections is not enough to comprehensively plan for long-term regional growth.	Recommend that the policy be modified as follows: “a) identify, <a href="#">coordinate</a> and allocate 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 1.2.4d	In keeping with other policies in the Provincial Policy Statement, growth and development should be directed to area with existing or planning transit corridors.  Increased density along major transit corridors may be inappropriate where stations do not exist or are not planned for	Recommend that the policy be modified as follows: “b) identify areas where growth or development will be directed, including the identification of nodes and the <a href="#">existing and future transit</a> corridors linking these nodes;...”

Policy Number	Rationale	Recommendation
	(e.g. between GO railways). Reference to major transit corridors should match the Growth Plan by rephrasing to major transit stations, where increased density is more appropriate.	d) where major transit corridors exist or are to be developed, identify density targets for areas adjacent or in proximity to these <del>corridors and</del> <a href="#">major transit</a> 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 impacts.	Recommend that the policy be modified as follows: "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 <a href="#">air pollution</a> , 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 <a href="#">by appropriate design, buffers and/or separation from each other</a> in accordance with provincial guidelines, standards and procedures."
1.2.6.2	There have been many instances where major facility operators have experienced issues with the long term operation, maintenance and expansion of major facilities (e.g. water and wastewater and waste facilities) where sensitive land uses are located in close proximity. This can represent a significant barrier to expansion of existing facilities, which may be required to provide the servicing	Staff recommend that planning policies ensure effective separation of sensitive land uses from incompatible major facilities, such as water and wastewater facilities.

Policy Number	Rationale	Recommendation
	capacity to support additional housing capacity and/or job creation.	
1.3.1	<p>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.</p> <p>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.</p>	<p>Recommend that the policy be modified as follows:  “a) providing for an appropriate mix and range of employment <u>and</u> institutional uses, <del>and mixed uses</del> to meet long-term needs, <u>where appropriate</u>.”</p> <p>Recommend defining “strategic sites for investment”.</p>
1.3.2.2	<p>As per Growth Plan policy 2.2.5.6, both upper and single tier municipalities will designate employment areas in official plans.</p> <p>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.</p> <p>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.</p>	<p>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 <del>local</del> official plans.”</p> <p>Recommend that the second paragraph be a standalone policy and be revised to refer to all employment areas.</p> <p>Recommended that the policies be modified to refer to all employment areas.</p>
1.3.2.3	<p>This policy implies that there are certain employment areas planned only for industrial and manufacturing and should be treated differently.</p> <p>This policy also implies that residential uses are ancillary uses to employment areas and are permitted within employment areas.</p>	<p>Recommend the policy be revised to refer to all employment areas.</p> <p>Recommend that reference to residential uses, including residential institutional uses, within any employment area be removed.</p>

Policy Number	Rationale	Recommendation
	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	<p>Employment area conversions occurring outside of an MCR are of concern. At minimum the wording should mirror the conversion policies in the Growth Plan, including the one-time opportunity for conversion and criteria to convert. It is also recommended that criteria be added to provide clarity regarding if all or only certain types of conversion requests could be considered outside of a MCR.</p> <p>As written, the policy states that conversions cannot occur outside of an MCR within Provincially significant employment zones or regionally significant employment areas. Regional staff are supportive of the flexibility to identify regionally significant employment areas specific to local context as this is supportive of Provincial objectives to support the long term protection of employment areas. However, clarification is needed for regionally significant employment areas, including:</p> <ol style="list-style-type: none"> <li>1. A definition of regionally significant employment areas.</li> <li>2. Confirmation of who identifies them, as it is unclear what a regional economic development corporation is. Regionally significant employment areas should only be identified by upper- or single- tier municipalities who service the long term public interest.</li> <li>3. Clarification on how they differ from Provincially significant employment zones.</li> <li>4. Confirmation that they are to be designated in Regional and upper-tier Official Plans, as referred to in policy 2.2.5.6 of the Growth Plan.</li> </ol>	<p>If conversions are supported outside of an MCR, staff recommend limiting to a one-time opportunity for conversion with associated criteria to convert employment land.</p> <p>Recommend the addition of criteria to identify what types of conversion requests could be considered outside of a municipal comprehensive review.</p> <p>Recommend the policy be revised to clarify what regionally significant employment areas are. It should also clearly state that upper- and single-tier municipalities identify regionally significant employment areas.</p> <p>Recommend the addition of the following definition :</p> <p>“Regionally significant employment area: Employment areas that have long-term regional interest for reasons including, but not limited to:</p> <ol style="list-style-type: none"> <li>a. their location near infrastructure for major transportation or goods movement;</li> <li>b. their strategic role and/or economic impact to the region;</li> <li>c. the presence of high concentrations of employment, business clusters or nodes; and</li> <li>d. the availability of a large quantum of</li> </ol>

Policy Number	Rationale	Recommendation
		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.”
1.4.1	<p>It is unclear how housing “types” (e.g. 1.1.1 &amp; 1.3.2.b.2), “options” (e.g. 1.4.1 &amp; 1.4.2), and “forms of” differs from each other throughout the PPS.</p> <p>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.</p>	<p>Recommend consistency by only using the defined “housing options” terminology, which includes housing types, throughout the Provincial Policy Statement.</p> <p>Recommend removing proposed additional paragraph.</p>
1.4.3	<p>“Special needs” in b.1 is an outdated term and should be updated.</p> <p>See comment associated with policy 1.1.1.b regarding market-based needs.</p>	<p>Recommend that the policy be modified as follows:</p> <p>“b) permitting and facilitating:</p> <ol style="list-style-type: none"> <li>1. all housing options required to meet the social, health, economic and well-being requirements of <a href="#">all</a> current and future residents, including <del>special needs requirements</del> <a href="#">the needs of vulnerable populations</a> and needs arising from demographic changes and employment opportunities, <a href="#">including opportunities to age in place</a>; and...”</li> </ol>
1.6.1	<p>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.</p>	<p>Recommend that the policy be modified as follows:</p> <p>“Infrastructure and public service facilities shall be provided in an efficient manner that prepares for <a href="#">and adapts to</a> the impacts of a</p>



Policy Number	Rationale	Recommendation
		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 <a href="#">and renewable energy</a> to complement infrastructure”
1.6.6.1	<p>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.</p> <p>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.</p> <p>Municipalities need additional support materials that aid in the cost-benefit analysis needed to determine the optimum density related to infrastructure investment.</p>	<p>Recommend that the policy be modified as follows:</p> <p>“Planning for sewage and water services shall:</p> <p>a) <a href="#">direct and</a> accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:</p> <ol style="list-style-type: none"> <li>1. municipal sewage services and municipal water services; and</li> <li>2. private communal sewage services and private communal water services, where municipal sewage services and municipal water services are not available or feasible;</li> </ol> <p>b) ensure that these systems are provided in a manner that:</p> <ol style="list-style-type: none"> <li>1. can be sustained by the water resources upon which such services rely;</li> <li>2. prepares for the impacts of a changing climate;</li> <li>3. is feasible, <del>and</del> financially viable over their lifecycle <a href="#">and complies with all regulatory requirements</a>; and...”</li> </ol>

Policy Number	Rationale	Recommendation
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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 on-site 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 studies have had limited success identifying failures.</p>	<p>Recommend that the policy be modified as follows:</p> <p>“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 <a href="#">in accordance with the Ontario Building Code</a> <del>of such services with no negative impacts</del>. In settlement areas, individual on-site sewage services and individual on-site water services may <a href="#">only</a> be used for infilling and minor rounding out of existing development.”</p> <p>Recommend the second paragraph be removed. Alternatively, further clarification on the scale of the assessment is required.</p>
1.6.6.7	Staff support the principle of an integrated and holistic planning process but have concern with the addition of stormwater to water and wastewater planning due to jurisdictional issues in two-tier	<p>Recommend that the policy be modified as follows:</p> <p>Planning for stormwater management shall:</p>

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

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

Policy Number	Rationale	Recommendation
	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 allowances to allow for effective support of continuous linear corridors. This policy should be strengthened by removing “wherever feasible”.	Recommend the policy be modified as follows: “The preservation and reuse of abandoned corridors, <u>and unopened road allowances</u> for purposes that maintain the corridor’s integrity and continuous linear characteristics should be encouraged, <del>wherever feasible.</del> ”
1.6.8.5	Staff support the addition of this policy, however additional clarity 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).	Recommend that “co-location” be clarified.
1.6.10.1	The removal of considering the implications of land use patterns on waste generation, management, and diversion should not be removed. It is counter to developing sustainable communities.  The Provincial Policy Statements should also speak to all four tools for waste management through the addition of “recover”. Directives should be included that address waste minimization and the progression towards a zero waste society.	Recommend that the policy be modified as follows: “Waste management systems need to be provided that are of an appropriate size and type to accommodate present and future requirements, and facilitate, encourage and promote reduction, reuse, <del>and</del> recycling <u>and recovery</u> objectives <u>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...</u> ”
1.7.1	It is unclear what is meant by “community investment-readiness”, therefore, additional clarity is needed.  Staff are supportive of encouraging complete communities and provided live work opportunities for residents; however, inclusion of a housing policy in the economic prosperity section raises concerns of having unintended consequences for increased pressures of employment area conversions to permit residential uses within	Recommend that “community investment readiness” be clarified.  Recommend that this policy be modified as follows: “Long-term economic prosperity should be supported by: a) promoting opportunities for economic

Policy Number	Rationale	Recommendation
	<p>employment areas. It is more appropriate to attach a housing reference to an existing policy on economic development.</p> <p>Staff are supportive of the added wording regarding local food and the agri-food network.</p> <p>Staff recommend recognizing the human health of nature, including reducing stress, depression, and high blood pressure.</p>	<p>development, <del>and</del> community investment-readiness <u>and housing options for a diverse workforce and plans for future work patterns</u></p> <p><del>b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;</del></p> <p>k) minimizing negative impacts from a changing climate and considering the ecological <u>and human health</u> benefits provided by nature;...”</p>
1.8.1	Staff support the policy changes as they strengthen the policy objectives.	
<b>2.0 Wise Use and Management of Resources</b>		
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.	<p>Recommend that this policy be modified as follows:</p> <p>“Municipalities may choose to <del>manage</del> <u>protect</u> wetlands not subject to policy 2.1.4 and 2.1.5; <del>in accordance with guidelines developed by the Province.</del>”</p>
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.	
<b>3.0 Protecting Public Health and Safety</b>		
3.2.3	York Region staff supports the added policy that encourages the re-use of soil.	

Policy Number	Rationale	Recommendation
<b>4.0 Implementation and Interpretation</b>		
4.7	<p>Staff are concerned this proposed policy is redundant due to recent changes to the Planning Act to reduce the time permitted to review applications which came into effect on September 3, 2019 . It is also unclear what priority applications are.</p> <p>Staff are supportive of other options to help streamline the planning and development process, such as:</p> <ol style="list-style-type: none"> <li>1. consolidating <i>Environmental Assessment Act, 1990</i> and <i>Planning Act, 1990</i> approvals.</li> <li>2. 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.</li> </ol>	<p>Recommend removal of this proposed policy.</p> <p>Recommend pursuing other avenues to streamline the planning and development process.</p>