

APPENDIX A
Detailed Comments on Bill 185 and the Proposed Provincial Planning Statement

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Item #	ERO/ORR #	Title of ERO/ORR Post	Staff Comments
1	019-8366	Additional Residential Unit Regulatory Making Authority	Staff have identified situations or locations where Additional Residential Units located at the rear of a front-loaded property may not be within a reasonable distance to a street or hydrant, resulting in the potential for Emergency Services to be unable to properly fight a fire. Further, some built forms provide insufficient access (ie. 0.6 metres) to the rear of a lot, limiting the potential for accessing a unit in the event of emergency. Limiting distances may also be an issue where ARU's are located in close proximity to a lot line.
2			Staff recommend further consultation on Additional Residential Units with the City's operations and environmental services departments, utility companies and emergency services to ensure appropriate standards are maintained and are in place to provide appropriate levels of service for infrastructure, utilities, and life safety measures; More information is needed from the province on the requirements to support a decision by the Minister to remove municipal zoning by-law regulations for ARUs and determine its implications. Staff do not object to the proposed change, however request that the province provide more information in order to determine the impact of the changes to lower-tier municipalities and consult with municipalities before any regulations are brought into effect.
3	019-8368	Municipal Planning Data Reporting	The province should provide clear instructions to guide municipalities for the summary table data requirements to avoid misinterpreting and duplicating data. Further, clarification is requested if this is a requirement or an option to note a withdrawal of an application.
4			The province should explicitly state in their instructions to municipalities to not double count units if there are official plan amendment, zoning by-law amendment, site plan, and subdivision applications that are part of the same property address and submitted in the same quarter of reporting.
5			Official plan amendments may not have unit counts associated yet, are not yet definitive, and could change at subdivision and site plan submission. The province should recognize residential units in Official Plan and Zoning By-law Amendments may change at Site Plan and Plan of Subdivision and may need to be reconciled to avoid double counting units.
6			The province should clarify what the timeframe is for municipalities to report on a summary table for each application type, the new reportable actions, and geospatial data for designated serviced land supply as Municipalities need time to gather and organize the data. The province should also consult with municipalities on the necessary resourcing and timelines to implement the new reporting requirements.
7	019-8369	Proposed Bill 185, Cutting Red Tape to Build More Homes Act	Reducing Parking Minimums - Removing vehicular parking requirements for developments within MTSAs, except for bicycle parking, will allow developers to always build less or no parking, putting enormous pressure on municipalities to provide on-street or off-street public parking. New residents would be looking for overnight parking somewhere, whether on-street or in an off-street parking lot/garage.
8		Reducing Parking Minimums - Limiting parking requirements to just bicycle parking would preclude the need for developers to provide parking and charging infrastructure for micro-mobility devices, whether it is one, two, three or four-wheeled devices, unless this regulation is updated in the near future to provide for it.	
9		Reducing Parking Minimums - A major transit station area does not necessarily mean that all transit infrastructures are in place to support the developments. Additional policies are needed to support and strengthen municipalities' ability to manage the gap until full transit services are available. There needs to be policies to support municipalities' ability to deliver public infrastructure such as active transportation, public parking, etc and delivery of TDM programs as part of any developments. TDM programs may include hard measures such as provision of bicycle parking, bike share, car-share and soft measures such as financial contributions to support these programs.	
10		Reducing Parking Minimum - If minimum parking is eliminated, how will this affect the need for accessible parking? Currently our accessible parking is based on a percentage of the requirement. Similarly, this applies to parking spaces for EVs.	

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11		<p>Reducing Parking Minimums - Are there specific criteria for selecting MTSA where the parking minimum would be eliminated? It should be noted that not all MTSA's have the same level of transit services throughout the day. The removal of parking requirements should be specific to MTSA's that have demonstrated sufficient transit services capacity or are undergoing funded improvements in transit service to support travel demand.</p> <p>When eliminating the minimum parking requirement in MTSA with insufficient transit services will add significant pressure to on-street parking demand and burden city resources.</p> <p>Staff are generally supportive of reduced parking minimums, but additional policies are required to support and strengthen the ability of municipalities to manage the time gap until the higher order transit and other supportive services are available. Specifically, additional policies and investments from senior levels of government are required, in the interim, to support the delivery and operation of higher frequency bus services and public infrastructures such as active transportation networks, public parking, and Transportation Demand Management programs as a part of any development.</p>
12		<p>Upper-tier Planning Responsibilities – How will transportation planning be coordinated and delivered with the loss of upper-tier planning responsibilities.</p>
13		<p>Upper tier Planning Responsibilities – How infrastructure planning will be coordinated and delivered with the loss of upper-tier planning responsibilities.</p>
14		<p>Municipal Pre-Application Process - Making pre-application consultation discretionary will introduce uncertainties for the applicant as the applicant may not have all the information to make a fully informed submission and can cause delay in processing the review.</p>
15		<p>Municipal Pre-Application Process - By making pre-application consultation discretionary introduces uncertainties for the applicant as the applicant may not have all the information (such as secondary plan servicing strategies and downstream servicing constraints) to make a fully informed submission and can cause delay in processing the review.</p>
16		<p>Municipal Pre-Application Process - Removal of the Pre-Application Consultation process could result in significant delays, as required studies for review may not be submitted with the applications. Also, it is unclear how Development Proponents will know what to submit with an application. This may result in a higher number of refusals and Development Proponents applying for the wrong application type.</p>
17		<p>Municipal Pre-Application Process (Appeals) - This contradicts removal of the Pre-Application Consultation requirement and allows a Development Proponent to appeal their submission requirements any time during the processing of an application, which can cause confusion, delay and disrupt the Planning process. It could also potentially allow a Development Proponent to appeal based on the outcome of a study.</p>
18		<p>Exempt Universities from Planning Act - For student housing on- and off-campus, how do we ensure that supporting infrastructure is in place or coordinated to accommodate the development?</p>
19		<p>Exempt Universities from Planning Act - For student housing on- and off-campus - how do we ensure that:</p> <ul style="list-style-type: none"> • Supporting infrastructure are in place or coordinated to accommodate the development? • Conveyance requirement for road rights-of-way are achieved. • There are no unintended consequences that may affect neighboring sites and communities For example, how will traffic operational issues be addressed? How will the cost of improvements and mitigation be covered? <p>Note. The Municipal Servicing By-law may provide some form of control and cover some of the above-noted elements.</p>
20		<p>Exempt Universities from Planning Act - The proposed policy does not specifically mention student housing, however the Backgrounder provided by the province explains that the intent of the new policy is to accelerate the development of new student housing on and off campus by post-secondary institutions by removing barriers such as the timelines and fees associated with the approval of applications. This means applicable post-secondary institutions would not need to obtain approvals for official plan amendments, zoning by-law amendments, site plan approval, etc. There do not appear to be exemptions to other laws and bylaws that regulate building construction.</p>

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			<p>The City acknowledges the need for more safe, affordable and accessible student housing options, but has concerns with the proposed policy. More information is needed to understand if the "undertakings" would still be required to conform to provincial, regional (where applicable), and local policy direction to ensure student housing is provided in appropriate locations (i.e., outside, or away from hazards), supported by the necessary infrastructure, and has access to community services and facilities, among other things. Technical considerations related to these matters are identified during the approval process. It is also not clear whether exemptions from Planning Act approvals are sufficient to expedite the development of student housing.</p>
21			<p>Upper Tier Planning Responsibilities - In the absence of a Regional Planning Authority, there could be a lack of coordination between neighbouring municipalities for orderly development and growth management. This could also impact the delivery of services and the provision of infrastructure.</p>
22			<p>Upper Tier Planning Responsibilities - The proposed amendment would bring into force the removal of York Region's planning responsibilities. Comments on the proposed removal of York Region's planning responsibilities were provided in the November 22, 2023 staff report to Council entitled ""Comments on the More Homes Built Faster Act, Bill 23 and Associated Registry Postings"", and a subsequent staff report to DSC on December 12, 2023 entitled ""Comments on York Region's Draft Regional Planning Transition Plan"". The comments and recommendations in those reports continue to apply in that more information is needed from the Province and York Region to support the transition in planning responsibility, and confirm the resourcing and financial implications for Markham, particularly if the intent is to streamline and make the planning process more efficient. Specifically, the Province should provide information to lower-tier municipalities about approvals for official plan amendments, including secondary plans, that will be delegated to lower-tier municipalities (e.g., exemption criteria). York Region should provide the information requested in relation to the Activities to Prepare for Proclamation in Appendix B of the December 12, 2023 staff report to help facilitate the transition.</p> <p>Staff support the proposed change and recommend the province pass an order exempting local municipalities from provincial approval for official plan and secondary plan amendments.</p>
23			<p>Standardized Housing - Unclear what the "prescribed criteria" is.</p>
24			<p>Standardized Housing - construction should include designing and building homes to be energy efficient (i.e. increased air tightness, thicker insulation, energy efficient heating & cooling, solar readiness) which will avoid homeowners from having to retrofit their home in 10-20 years.</p>
25			<p>3rd Party Appeal - Staff are supportive of changes to the appeal process that would improve timelines for the delivery of development projects. However, the removal of appeal rights represents a significant shift in public participation throughout the planning process and will place greater emphasis on the need to participate in public consultation.</p>
26			<p>General Comment - There is no reference to how the natural environment will be protected (i.e, potential for deforestation from mass timber construction using Ontario trees, managing greenhouse gas emissions from constructing homes, types of materials used to build homes, etc.)</p>
27			<p>Expediate Community Service Facilities - The intent of the proposed policy is to provide the Minister with the authority to make regulations that would expedite the approval of priority government projects such as schools, long-term care homes or hospitals. If passed, the regulation-making authority would provide for the non-application or restriction of any provision of the Planning Act or a regulation made under section 70.2 (development permit system).</p> <p>The City is supportive of efforts to expedite the provision of more schools, long-term care homes, and hospitals to meet the present demand for these services, and also to keep pace with population growth. Concerns are raised in terms of ensuring these facilities are planned and sited appropriately in conformity with the land use planning framework to support the development of complete communities. Technical considerations related to these matters are identified during the approval process. It is also not clear if the proposed regulation-making authority is needed if Ministerial approval for priority government projects can be provided through a zoning order. Staff also question whether the non-application or restriction of Planning Act approvals is sufficient to support the development of these types of community service facilities.</p>

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			Staff request the province clarify the scope of the proposed regulation making authority to streamline approvals for community service facilities including public schools, hospitals, and long-term care facilities and how priority project would be identified and expediated.
28	019-8370	Newspaper Notice Requirements and Consequential Housekeeping	Support the changes for all municipalities, even in instances where a local newspaper is not available.
29			Staff support proposed revisions to the regulations that would give the City the option of satisfying notice requirements by posting notices on the City's website and not require newspaper notices if a local newspaper is not available. The regulation wording should be clear and preferably provide discretion to the municipality to determine if a local newspaper is available/unavailable.
30	019-8371	Enhance Municipalities to Invest in Housing Enabling Infrastructure	Repeal 5-year phase in of Development Charges By-laws - Section (7) Transition provision does not appear to make reference to the DC rate that should apply to site plan and zoning amendment applications with rates frozen between January 1, 2022 to November 28 2022. Staff support this proposal with a request for clarification on the transition provision.
31			Re-instate studies as an eligible DC Cost – Staff support
32			Reduced timeframe for freezing DCs from 2 years to 18 months – Staff support
33			Streamline process for municipalities to extend existing DCs – Staff support
34	019-8462	Proposed Provincial Planning Statement	N/A
35			General Comment - Clarity around transition, how transition is defined and enabling tools to achieve transition
36			General Comment - How to ensure an appropriate balance/mix of uses (i.e complete community, avoiding over-development of residential uses on these types of lands which then in turn become under-served by commercial, service, retail, schools, amenity, open space, etc.
37			Rural Settlements - Require additional guidance on how development needs to be approached in rural settlement areas from a sustainable, compact and complete communities lens
38			Chapter 1- Introduction and Vision - Previous comments on the Vision remain relevant. The Vision statement in the PPS provides important context for the interpretation of policies and should provide an approach that balances provincial interests. These should include consideration for the natural environment, natural resources, cultural heritage and archaeological resources along with emphasizing housing as a priority and recognizing the wise use and management of natural resources, protecting significant ecosystems and addressing climate change as key provincial interests to be addressed in the implementation of the PPS.
39			Chapter 2 – Building Homes, Sustaining Strong and Competitive Communities, 2.1 - Staff support the inclusion of a limit to the planning horizon which addresses previous comments raised by the City. However, clarification is requested regarding the methodology that will be used by the Ministry of Finance to allocate the 25-year projection to local municipalities. Previous comments that raised concerns about a planning authority's ability to coordinate and phase land use and infrastructure planning to accommodate growth approved outside a municipal comprehensive review (i.e., MZOs) are still relevant.
40			Chapter 2 – Building Homes, Sustaining Strong and Competitive Communities, 2.2 - Staff support the overall intent to increase opportunities for housing through intensification, but maintain they should be directed to appropriate locations identified to accommodate population growth outside of employment areas (i.e., strategic growth areas with mixed use designations). Existing commercial and retail uses in mixed use designations should also be retained through redevelopment to ensure residents have access to shopping and personal services and support the creation of a complete community. It is noted that lands designated 'Commercial' form part of the City's Employment Area component in the urban structure shown on Map 1 - Markham Structure. These lands are intended to support more intensive office, service and retail uses over time, and residential uses are not permitted on them to avoid destabilizing commercial corridors and nearby employment areas. In relation to this, previous concerns about protecting employment areas from the introduction of sensitive land uses are also still relevant.
41			Chapter 2 – Building Homes, Sustaining Strong and Competitive Communities, 2.2.1.D - Previous comments to the policy remain relevant. The proposed policy should maintain the reference to establish guidelines or standards which would allow municipalities to take into consideration the goals and objectives of a heritage conservation district, among other things, if residential intensification is proposed.
42			N/A
43			Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.3 Settlement Areas and Settlement Area Boundary Expansions (2.3.1) - Staff are supportive of the revisions. When considered together they provide direction to continue accommodating growth through intensification in areas identified to accommodate growth instead of new settlement areas.

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		<p>It is noted that designated growth areas in Markham, known locally as the Future Urban Area which comprises residential and employment areas, are being planned to achieve an overall density of 70 people and jobs per hectare. This higher target is based on extensive technical analysis and community consultation should be maintained.</p> <p>Staff previously provided comment that large and fast-growing municipalities should be required to plan for a minimum density target in designated growth areas to ensure a compact and urban form of development will occur in greenfield areas in a manner that limits urban sprawl.</p>
44		<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.3.2 New Settlement Areas and Settlement Area Boundary Expansions - The proposed revisions provide a stronger policy basis for the identification of settlement expansion areas than the previous draft. The criteria relating to the need for additional land, impacts to agriculture, infrastructure capacity, and phasing of growth would be relevant to the future consideration of settlement expansion needs in Markham and are supported. Additional considerations addressing impacts to natural systems in the planning for settlement expansions would provide a more comprehensive set of criteria for their evaluation consistent with previous direction included in the existing PPS and Growth Plan.</p> <p>See also response to the proposed administrative amendment to the Greenbelt Plan in Comment # 11 below to ensure links in the Greenbelt Plan to policies in the Growth Plan are maintained upon its revocation.</p> <p>Staff support the revisions to expand and strengthen the criteria to be considered when identifying new settlement areas and settlement area boundary expansions.</p>
45		<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.4 Strategic Growth Areas (2.4.1) - Markham has a well-established approach based on a hierarchy of intensification areas to direct growth and development to strategic growth areas. The City should continue to build on this approach, which exceeds the direction in revised Policy 2.4.1.1.</p>
46		<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.4 Strategic Growth Areas (2.4.1.3.d) - staff are supportive of the policy direction that encourages consideration to prepare a student housing strategy when planning in strategic growth areas. As per the comments to proposed amendments to the Planning Act that would exempt the undertakings of publicly assisted post-secondary institutions from Planning Act comprehensive planning is needed to ensure student housing is provided in appropriate locations (i.e., outside, or away from hazards), supported by the necessary infrastructure, and has access to community services and facilities, among other things.</p>
47		<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.4 Strategic Growth Areas (2.4.1.3.e)- staff support the redevelopment of underutilized commercial and retail uses as outlined in the comments to Policy 2.2.1 b).</p>
48		<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.4 Major Transit Station Areas (2.4.2) - As noted in the comments to the 2023 version of the Proposed Provincial Planning Statement, the York Region Official Plan, 2022 identified 23 MTSAs in Markham with minimum density targets. The MTSAs delineations were generally based on the key development areas and intensification area boundaries in the Official Plan, 2014, and comments endorsed by Markham Council. The Markham MTSAs identified in the YROP will be added to the Markham official plan through the upcoming official plan review. Staff are supportive of the direction in Policy 2.4.2.3 and recommend modifying to support and strengthen the ability of municipalities to manage the gap until transit and other supportive services are available. It should be recognized that transit will not be delivered immediately and there will be an interim condition until a desired mode shift is achieved.</p>
49		<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.5 Rural Areas in Municipalities - Changes to the Rural Areas and Rural Lands policies reinstate direction that rural settlement areas shall be the focus of growth and remove the permission that multi-lot development on Rural Lands would be a permitted use where site conditions for servicing are suitable. The previous policies would have facilitated a sprawling, inefficient development pattern in rural/agricultural areas outside settlement areas. Staff support the changes as they address previous comments.</p> <p>Previous comments requesting an additional policy to permit lot creation to facilitate protection of protected heritage resources have not been addressed.</p> <p>Staff support the revisions reinstating policy direction that rural settlement areas shall be the focus of growth and development in rural areas. Staff also recommend that a specific policy be considered to address lot creation on a smaller parcel to enable protection of protected heritage resources in rural areas.</p>

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50			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.6 Rural Lands in Municipalities - Providing appropriate direction for housing development on Rural Lands based on key principles for managing growth is an important policy consideration. The proposed revision removing the policy permitting multi-lot development outside settlement areas is supported.</p>
51			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.8 Employment (2.8.1.1 e) - Staff support the inclusion of a policy recognizing the need to protect the operational viability and long-term stability of employment areas from sensitive land uses. Guidance should also be provided regarding "appropriate" types of transitions. See also comments to Policy 2.8.4.4.</p>
52			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.8 Employment (2.8.1.4) - Previous comments are still relevant. While staff agree that major office and major institutional uses should be directed to MTSA's and strategic growth areas, in practice it is difficult to achieve office and institutional uses in mixed use areas that include residential development due to land values and market conditions. Office and institutional uses should continue to be provided for employment area designations in strategic locations (i.e., adjacent to highways or major goods movement and facilities and corridors).</p> <p>Staff recommend revising the policy to encourage the development of office and institutional uses in employment areas as well as MTSA's and SGAs.</p>
53			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.8 Employment (2.8.2.3 c)- Previous comments are still relevant. Staff are not supportive of the policy as currently worded, as it would limit the range of uses that can be designated in new employment areas and put existing employment lands that do not meet the new policy at risk of conversion to non-employment uses.</p> <p>Staff recommend modifying the policy to provide flexibility to planning authorities to permit retail and office uses in employment areas to support clusters of economic activity.</p>
54			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.8 Employment (2.8.2.4) - Staff support the overall intent of the revision to maintain land use compatibility between employment areas and sensitive land uses but note that it is not sufficient. This policy, or Section 2.8.2.4, should be further modified to require separation or mitigation from sensitive land uses adjacent to employment areas planned for industrial and manufacturing uses (i.e., current Policy 1.3.2.2) as a first step to protecting the operational viability and long-term stability of employment areas.</p> <p>Staff recommend incorporating the direction in Policy 1.3.2.2 in the in-effect PPS in this section.</p>
55			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.8 Employment (2.8.2.5)- Staff support the inclusion of the condition that would require demonstrating sufficient employment land is available to the list of criteria as it partially addresses previous comments. Previous comments about the intent of the overall changes proposed to this policy still apply. The concern is that privately initiated applications for employment conversions will lead to the fragmentation of Markham's employment areas, which would have an adverse impact on the long-term integrity and viability of the employment areas, protection and creation of jobs, and the local economy.</p> <p>Staff do not support privately initiated applications for employment conversions. Flexibility to consider employment conversions should be limited to municipality-initiated amendments.</p>
56			<p>Chapter 2: Building Homes, Sustaining Strong and Competitive Communities, 2.9 Energy Conservation, Air Quality and Climate Change - Climate change is a serious issue that impacts people, communities and ecosystems at all levels, globally, regionally and local. Key policies should be strengthened, and consideration be given to embedding more direction in key sections specifically requiring climate change risk and vulnerability assessments when undertaking watershed and infrastructure planning to support growth as well as stronger policy direction to facilitate renewable and alternative energy systems through the planning approval process. Policies in the existing Growth Plan should be carried forward in the proposed PPS.</p>

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57		Chapter 3: Infrastructure and Utilities, 3.8 Energy Supply - This change has no major implications to the City of Markham. Energy storage systems and facilities store energy produced at one time for use at later time to improve energy system efficiency, performance and reliability.
58		Minimizing Length of Vehicular Trips - Proposed deletion of policy 1.6.7.4 that encouraged minimizing the length and number of vehicle trips and supporting transit and active transportation through land use, density and mix of uses. This policy should be carried forward in the new PPS.
59		Chapter 3: Infrastructure and Utilities, 3.6 Sewage, Water, and Stormwater 3.6.2 - Optimizing existing infrastructure is more cost effective, sustainable and efficient and should be prioritized over constructing new infrastructure or relying on private infrastructure. Staff object to the proposed changes that would remove the policy direction requiring planning authorities to promote intensification and redevelopment to optimize the use of municipal sewage services and municipal water services.
60		N/A
61		Chapter 4: Wise Use and Management of Resources, 4.1 Natural Heritage - Staff support the proposed policies that would maintain the natural heritage policy framework of the current PPS. The City's Greenway System policies provide a high standard of protection for natural heritage in Markham that go beyond the minimum requirements of the PPS. The removal of the Natural Heritage System of the Growth Plan has no significant implications for the City as features within the NHS are designated and protected within the City's Greenway System policies. Provincial guidelines for natural heritage planning have not been updated in many years and guidelines for water resource system planning and identification have not been developed. Staff recommend that guidelines be reviewed, updated and developed to support implementation of the proposed new PPS. Staff support the proposed natural heritage and water resource policies and recommend the province update and develop guidelines for natural heritage and water resource system planning.
62		Chapter 4: Wise Use and Management of Resources, 4.2 Water Resources – See recommendation above
63		Chapter 4: Wise Use and Management of Resources, 4.3 Agriculture - Staff support the proposed changes strengthening direction for planning authorities to use an agricultural system approach, but do not recommend permitting new additional residential units to be severed, including through farm consolidation if they are created as separate dwelling units that are not attached to the primary dwelling on the property. The province should consider limiting the number of additional residential units that may be permitted in prime agricultural areas to one additional unit in addition to the main primary dwelling.
64		N/A
65		Chapter 4: Cultural Heritage and Archaeology, 4.6.1 - The proposed revisions to the policy in combination with the proposed removal of the definition of significant as it applies to cultural heritage and archaeology are concerning as they would limit a planning authority's ability to conserve unprotected resources that have been determined to have cultural heritage value or interest. Staff recommend the existing Cultural Heritage and Archaeology policies in the PPS, 2020 be retained as they provide more appropriate protection of cultural heritage and archaeological resources. If policy 4.6.1 is to be retained with the proposed amendments that only refer to "protected properties", then a new policy should be introduced that addresses unprotected built heritage resources and cultural heritage landscapes (now defined as being resources identified by a community). Suggested policy: Unprotected built heritage resources and cultural heritage landscapes shall be evaluated to determine if they should be protected heritage property and conserved.
66		Chapter 4: Cultural Heritage and Archaeology, 4.6.3 - The proposed amendments will make it challenging for municipalities to require planning applications to demonstrate how the heritage attributes of a protected heritage property will be conserved. Staff recommend retaining the existing policy text to clarify how this policy would be implemented as it currently refers to evaluation and demonstrating that heritage attributes will be conserved.
67		Chapter 4: Cultural Heritage and Archaeology, 4.6.4 - Staff recommend replacing "encourage" with "should", and that further guidance and clarity be provided on 4(b) to inform how this policy would be implemented.

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68		<p>Chapter 4: Cultural Heritage and Archaeology, 4.6.5 - Staff recommend further guidance and clarification be provided specifically on the extent to which a planning authority shall engage with Indigenous communities regarding built heritage resources and cultural heritage landscapes (CHL) as the policy refers to identifying, protecting, and managing these resources (i.e.. a heritage conservation district is a CHL, but is engagement required for every alteration permit in a district). Staff also suggest removing the undefined term “managing” from the policy.</p>
69		<p>Chapter 6: Implementation and Interpretation, Coordination, 6.2.6 - Staff request further guidance and clarification as to how, where and when planning authorities should undertake a coordinated approach to planning for multi-jurisdictional employment areas. It is also recommended that municipal comprehensive review policies from the Growth Plan as they apply to employment areas be carried forward.</p>
70		<p>Chapter 6: Implementation and Interpretation, Coordination, 6.2.8 - Staff recommend that policies regarding growth forecasts, the provision of a standard methodology to guide growth forecasting and requiring municipalities to meet minimum intensification and density targets in the Growth Plan be carried forward.</p>
71		<p>Adjacent Lands Definition - Staff recommend that the reference to ‘contiguous’ be replaced by ‘within 60 metres of’ to ensure a more accountable review of the impact of development on a protected heritage resource.</p>
72		<p>Built Heritage Resources Definition - Staff recommend that the current reference to designated property and heritage registers in the PPS, 2020 continue to be included.</p>
73		<p>Deletion to a portion of the Cultural Heritage Resource Definition - Staff recommend the existing reference in the Provincial Policy Statement, 2020 to how these features are typically identified (designation or registers) continue to be included.</p>
74		<p>Employment Area - As per the City’s comments to Bill 97, Markham’s employment lands are vital to the City’s economic wellbeing and required to accommodate industrial and office employment uses that contribute to the development of a complete and sustainable community. The proposed change to the “area of employment” definition would limit what can be considered an employment area and limit the range of uses that can be designated in new employment areas. It would also potentially increase employment conversion pressure on lands that do not meet the new provincial definition.</p> <p>Staff do not support the proposed change to the “area of employment” definition.</p>
75		<p>Administrative Amendments to Greenbelt Act - Staff support administrative amendments to the Greenbelt Plan required to maintain links to PPS policies and to current restrictions regarding settlement areas and expansions that were moved from the Greenbelt Plan to the Growth Plan in the 2017 provincial plan amendments. Amendments to the 2017 Greenbelt Plan removed the policy permitting minor rounding out of hamlets. Settlement expansion policies applying to settlements located in the Greenbelt apply to Towns/Villages only or, in the case of settlement area boundary adjustments, exclude settlements in the Greenbelt.</p>
76		<p>What are your overall thoughts on the updated proposed Provincial Planning Statement? Staff note that many of the 2024 draft proposed changes, to the 2023 draft proposed changes, are primarily focused on housing initiatives. The City maintains that a more comprehensive approach is needed, beyond simply updates to policies for housing initiatives, to develop and grow complete communities, and as such recommend that the concerns raised previously are still valid and should be reconsidered.</p> <p>In particular, the City further notes that overall, many of the issues raised by the City in the May 30, 2023 staff report remain unchanged or unaddressed. In particular, many concerns raised by the City were not addressed or not fully addressed for policies regarding Settlement Areas and Settlement Area Boundary expansion; employment, in particular employment conversion; cultural heritage, including associated definitions; energy conservation, air quality and climate change; transportation systems; sewage, water and stormwater; and coordination.</p> <p>Staff are encouraged that, although modified, the province has once again included the affordable definition. This definition will help to preserve the link with income thresholds to ensure low- and moderate-income individuals are targeted. However, the City once again stresses that an increase in the supply of housing will not necessarily improve housing affordability.</p>

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77			<p>What are your thoughts on the ability of updated proposed policies to generate appropriate housing supply, such as: intensification policies, including the redevelopment of underutilized, low density shopping malls and plazas; major transit station area policies; housing options, rural housing and affordable housing policies; and student housing policies?</p> <p>Overall, staff questions, if the latest updated proposed policies will generate appropriate housing supply, beyond what was previously included in the 2023 draft proposed changes, given that the City of Markham was already included as a “Large and Fast-Growing Municipality” in the 2023 draft. Further, without more tools and funding for implementation, including the development of appropriate infrastructure, the ability to generate additional housing supply may be challenging, especially for the development of affordable housing and housing for students.</p> <p>The City would like to see additional policies that encourage a wider range of unit types, unit sizes, and purpose-built rental throughout the community, including within our intensification areas and Major Transit Station Areas. In particular, policies to encourage a wide range of housing options that service community needs that could include family sized units, seniors, and purpose-built rental units, should continue to be considered.</p> <p>Inclusion of policies that support redevelopment of underutilized commercially designated retail lands (e.g., underutilized shopping malls and plazas) to more intensive non-residential development is important to be considered. However, the role and function of these areas needs to be reviewed comprehensively, so as not to destabilize and fragment the commercial areas. Consideration of intensification of non-residential uses, to support the overall municipal employment strategy, needs to be considered comprehensively within the planned municipal structure.</p> <p>New policies around student housing were introduced in the 2024 draft under Section 6.2 Coordination. These policies direct planning authorities to: facilitate early and integrated planning for student housing that considers the full range of housing options; and to collaborate on the development of a student housing strategy that includes consideration of off-campus housing targeted to students. More information is required to understand what is meant by “collaboration on the development of a student housing strategy” is needed, and how it may address the needs within the surrounding community. Additionally, directed tools and funding for implementation will be required to move from simply planning strategies for student housing, to actually developing student housing.</p>
78			<p>What are your thoughts on updated proposed policies regarding the conservation and management of resources, such as requirements to use an agricultural systems approach?</p> <p>Overall, while some elements of existing policies are not carried forward in the Provincial Planning Statement, the proposed direction that incorporates systems approaches for natural heritage, water resources and agricultural planning is welcome and will help support large and fast-growing municipalities plan and manage growth. The policy framework for large and fast-growing municipalities should continue to require implementation of science-based approaches for both natural heritage and water resource systems with clear protection standards and discretion that municipalities may go beyond minimum standards.</p> <p>The revision specifically requiring large and fast-growing municipalities to undertake watershed planning, in place of the previous direction that watershed planning is a discretionary option, is an important improvement and provides an ecologically meaningful scale for integrated and long-term planning to be undertaken. The improvement will help municipalities manage the impact of growth on the environment.</p> <p>While key improvements have been made, climate change policies could be more fully integrated into the policy framework to provide more specific direction that watershed planning consider climate scenarios and inform decisions relating to land use and development as well as infrastructure and stormwater management as currently proposed.</p> <p>The draft guidance for watershed planning should be updated and finalized with more technical direction on how climate change considerations should be incorporated into watershed characterization, impact assessments and management recommendations.</p>
79	24-MMAH09	Supporting Incentives for Economic Growth	<p>Based on initial review, the proposed Lieutenant Governor in Council (LGIC) regulation-making authority to allow the LGIC to authorize a municipality to provide assistance to a particular recipient The legislation presents a positive opportunity/incentivizing tool for municipalities to leverage and attract investments/support development projects (commercial, industrial, or advanced manufacturing). Making available this incentive tool will allow Markham to explore its application. The presentation of this incentive mechanism is currently at a high level with no details on the type of assistance being contemplated.</p>

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			<p>In terms of activating this incentive tool, municipalities would need to evaluate the financial impacts in line with the related pros/cons to evaluate the true benefits and determine if utilization of the incentives will be financially prudent.</p> <p>Staff support, in principle the new tool as it may be valuable as a part of a suite of incentive tools that municipalities could leverage to attract investments. However, further clarification and consultation is required on the regulations and criteria that would govern the exemption process.</p>
80			<p>More information is required from the province on the limits/restrictions and conditions for the types of assistance that may be granted to municipalities, to determine the resulting impacts of this amendment.</p> <p>The ability for municipalities to grant assistance to specified business through this amendment could be beneficial as it could support the implementation of strategic municipal goals (e.g. the delivery of affordable housing). It could reduce the scope of municipal tools, mechanisms and programs currently required to be put in place to provide specified businesses with assistance. Alternatively, the Provincially imposed restrictions and conditions proposed to be put in place are currently unknown and could pose potential challenges that are yet to be determined.</p> <p>Staff do not object to the proposed change and request further detail from the province on the limitations, restrictions and conditions that could be anticipated on the municipal granting of assistance to specified businesses, to determine the impacts.</p>