



## REPORT

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**TO:** Mayor Lawlor and Members of Council

**FROM:** Bronwyn Parker, Director of Planning Policy

**DATE:** January 4, 2023

**REPORT NO.:** PD-2023-0002

**SUBJECT:** Review of A Place to Grow and Provincial Policy Statement

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### RECOMMENDATION:

THAT Report No. PD-2023-0003 dated January 4, 2023, regarding the Review of A Place to Grow and Provincial Policy Statement, be received;

AND FURTHER THAT staff continue to assess the outcomes of this Review as it relates to potential impacts to the Town's land use planning program;

AND FURTHER THAT staff provide further update reports to Council as may be appropriate.

### KEY POINTS:

The following are key points for consideration with respect to this report:

- As identified in report PD-2022-0050, in conjunction with the Bill 23 changes to the land use planning system in Ontario, the Province is currently undertaking a review of the Growth Plan (A Place to Grow) and the Provincial Policy Statement (PPS).
- A proposal was posted on the Environmental Registry of Ontario (ERO) on October 25, 2022, for 66 days, closing on December 30, 2022, regarding this review.
- Planning staff has completed a separate submission regarding the A Place to Grow and PPS review. Those comments were submitted on December 21, 2022, and have been appended to this report as Appendix 1.
- This report provides Council with a more detailed overview of the ERO proposal and identifies key comments provided by staff.

## **BACKGROUND AND DISCUSSION:**

On October 25, 2022, Bill 23, the *More Homes Built Faster Act, 2022* was introduced into the Ontario Legislature. A series of postings on the Environmental Registry (ERO) with varying commenting deadlines were also introduced at the same time. One of these postings was [ERO #019-6177, "Review of A Place to Grow and Provincial Policy Statement"](#).

Bill 23 received Royal Assent on November 28, 2022, which took place in advance of the 66-day review period expiring for the Growth Plan and PPS review. Staff presented report PD-2022-0050 regarding Bill 23 and the related ERO postings to Council on December 12, 2022. At the time of that report, staff had not yet completed our analysis of ERO #019-6177 regarding the proposed review of A Place to Grow and Provincial Policy Statement. As such, this report provides Council with an update of the proposed review, as well as staff comments on the proposal.

### The PPS and Growth Plan

The Provincial Policy Statement, 2020 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan), both provide policy direction on key land use planning matters. These include:

- Growth management, housing and economic development;
- Infrastructure planning and investment, such as sewage, water and stormwater management services, transportation, transit, energy supply and corridor protection;
- Protection and management of resources, such as aggregates, natural heritage, water, cultural heritage, recreation and prime agricultural areas; and
- Protection of public health and safety, such as mitigating potential risks due to natural and human-made hazards.

While the PPS is issued under the *Planning Act*, the Growth Plan is issued under the *Places to Grow Act, 2005*. The PPS applies across the entire Province of Ontario and is the principal land use planning policy document upon which all planning decisions in Ontario must be based. The Growth Plan is a more detailed land use plan, which provides the framework for where and how growth should occur across the Greater Golden Horseshoe. It works with and is intrinsically linked to the Greenbelt Plan, Niagara Escarpment Plan and Oak Ridges Moraine Conservation Plans, with mirrored definitions and policies, creating a framework for which municipal Official Plans must follow.

### ERO Proposal

Similar to the context provided when Bill 23 was introduced, the Province suggests that both short-term strategies and long-term commitments are required by all levels of government in order to address Ontario's housing supply crisis. One such commitment involves reviewing the PPS and Growth Plan as is proposed through ERO #019-6177. The ERO posting explains that given the importance of the PPS and Growth Plan in guiding land use planning decisions in Ontario, ensuring that the policy framework is housing-supportive is integral to the implementation of the Housing Supply Action Plan

and meeting the target to construct 1.5 million new housing units across Ontario in the next ten years.

As such, the Province is proposing the integration of the PPS and Growth Plan into a single, province-wide planning policy document that would enable municipalities to approve housing faster and increase housing supply.

There were six core elements proposed through the review. These include:

### **Residential Land Supply**

1. **Settlement Area Boundary Expansions** – streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth
2. **Rural Housing** – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas
3. **Employment Area Conversions** – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate

### **Attainable Housing Supply and Mix**

1. **Housing Mix** – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs
2. **Major Transit Station Areas** – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario
3. **Urban Growth Centres** – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur

### **Growth Management**

1. **Population and Employment Forecasts** – policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment

2. **Intensification** – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas
3. **Large and Fast-growing Municipalities** – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit

### **Environment and Natural Resources**

1. **Agriculture** – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations
2. **Natural Heritage** – streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting/compensation
3. **Natural and human-made hazards** - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk
4. **Aggregates** – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed
5. **Cultural heritage** –policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply

### **Community Infrastructure**

1. **Infrastructure Supply and Capacity** – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning
2. **School Capacity** – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education’s proposal to support the development of an urban schools’ framework for rapidly growing areas

### **Streamlined Planning Framework**

1. **Outcomes-Focused** – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes
2. **Relevance** – streamlined policy direction that focuses on the above-noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests

3. **Speed and Flexibility** – policy direction that reduces the complexity and increases the flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier

In addition to identifying the core elements noted above, the ERO proposal asked specific questions to which Town staff provided detailed responses. Staff responses were submitted to the Ministry on December 21, 2022, and are attached as Appendix 1 to this report.

### Key Staff Comments

Overall, staff were generally supportive of the six proposed core elements identified in the ERO posting and focused comments on the questions provided, applying a locally specific lens. Staff responses noted areas of support, asked questions of clarification linked to other Bill 23 proposed changes, and provided clear dialogue regarding Halton Hills specific community needs.

Key comments/questions provided by staff include the following:

- The Town of Halton Hills declared a climate change emergency in 2019 in response to Canada's Changing Climate Report 2019. A combined document must include policies that support municipalities in their effort to take direct action to protect the environment, reduce greenhouse gases and develop effective climate change initiatives.
- The current Growth Plan policies are intrinsically linked to the Schedule 3 population and employment projections. More clarity is needed on how these projections will be established, including their geographic scope and whether it would be the basis for long-term growth in a combined PPS/Growth Plan document.
- How will the recent 'Housing Pledges' be linked to this new policy document? Greater certainty regarding density expectations in greenfield and built-up areas is necessary for long-term infrastructure planning in municipalities.
- Policies for Employment Area conversions should prioritize mixed-use development (with an employment component) that complement the surrounding local context where a conversion is being considered.
- Allowing local planning authorities to set context-appropriate densities within their MTSAs would help create transit-oriented neighbourhoods that better integrate into the surrounding community.
- Growth should focus on sustainable and compact development, that is pedestrian-friendly and maintains a connection to the natural environment.
- In previous ERO submissions for proposed Bill 23 changes, Town staff have expressed concerns over the reduced role of Conservation Authorities in planning policy and approvals processes and recommended that the Conservation Authorities continue to play a role in environmental plan review subject to appropriate Memorandums of Understanding (MOU) with municipalities.
- Policies for school capacities should continue to be informed by School Boards.

- Greater efficiency is welcome in Official Plans and other policy reviews; however, it should not come at the cost of public engagement. Where the potential for streamlining exists, opportunities to increase efficiency should be explored. The public engagement component of any review should not be compromised, and Provincial policy framework should encourage planning authorities to solicit meaningful public input.
- Town staff are supportive of a policy framework where:
  - policies look to incentivize housing development where existing servicing and transportation infrastructure can support an increase in supply;
  - Provincial support for municipally-led Community Improvement Plans can help better connect housing developers to funding support;
  - Provincial direction is provided for local planning policies for mixed-use developments in built up areas that would intensify the housing supply, while creating new employment opportunities closer to where people are living; and
  - Greenfield area planning is focused on compact mixed-use development. The Province should look to increase minimum density in greenfield areas from 50 people and jobs per hectare to 65.
- As it relates to streamlining land use planning policies, Town staff support an approach whereby duplication in submission requirements is avoided, and where the roles and responsibilities of approval authorities are clearly identified. Staff believe the municipal role of addressing Climate Change through mitigation and adaptation measures should continue to be respected (as currently set out in A Place to Grow section 4.2.10, and PPS section 1.8). Staff also suggest streamlining efforts should be focused on key intensification opportunities in built up areas where new units can be added faster within existing servicing and transportation infrastructure networks.
- Both the PPS and Provincial Growth Plan were recently updated and amended. It would be more practical to allow additional time for the impacts of these policy documents to be realized before making significant changes. If the preference is for one comprehensive document, the focus should be on removing any duplication, as opposed to removing core elements.
- Clarification should be provided on the roles of the upper tier/lower tier planning authorities as it relates to implementation.

## **STRATEGIC PLAN ALIGNMENT:**

This report has ramifications for many aspects of the Town's Strategic Plan such as:

- preserve, protect and enhance the Town's natural environment;
- to preserve, protect and promote our distinctive historical urban and rural character through the conservation and promotion of our built heritage and cultural heritage landscapes;
- to achieve sustainable growth to ensure that growth is managed so as to ensure a balanced, sustainable, well planned community infrastructure and services to meet the needs of residents and businesses; and,

- to provide responsive, effective municipal government and strong leadership in the effective and efficient delivery of municipal services.

### **RELATIONSHIP TO CLIMATE CHANGE:**

At this time, the impacts to the Town's Climate Change portfolio and initiatives are not fully understood given the potential policy changes that may arise through a combined province-wide PPS/Growth Plan document. As identified in this report, staff provided comments through the ERO submission highlighting the importance of including policies that support municipalities in their effort to take direct action to protect the environment, reduce greenhouse gases and develop effective climate change initiatives.

### **PUBLIC ENGAGEMENT:**

Public Engagement is coordinated by the province through the ERO. Where possible, at the implementation stages, the Town will ensure the public is provided an opportunity to be engaged and consulted on any required changes to local policies and procedures.

### **INTERNAL CONSULTATION:**

Internal consultation on this specific ERO posting was not necessary outside of the Development Review and Planning Policy teams.

### **FINANCIAL IMPLICATIONS:**

This report is administrative in nature and does not have any financial implications.

Reviewed and approved by,

John Linhardt, Commissioner of Planning & Development

Chris Mills, Chief Administrative Officer