

[ERO number: 019-6177](#)

Review of A Place to Grow and Provincial Policy Statement

Thank you for the opportunity to provide comments on the proposal to integrate the Provincial Policy Statement and A Place to Grow into a new province-wide planning policy instrument to help create a streamlined Provincial land use planning policy framework that enables municipalities to approve housing faster and increase housing supply. Below please find the Town of Halton Hills' comments:

Question 1: What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?

Town staff are generally supportive of the six proposed core elements of this review, and offer the following comments:

- Considering the goal of Bill 23 is the creation of an additional 1.5 million new homes in Ontario over the next 10 years, a combined document with a focus on increasing housing supply must continue to ensure the protection of finite resources including prime agricultural areas and environmentally sensitive areas such as the Greenbelt and the Niagara Escarpment area are appropriately protected in these municipalities. 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.
- Much of what exists in the current Growth Plan is tied to the Schedule 3 projections. More clarity is needed on how these projections will be established, 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.

Residential Land Supply

- Urban area boundary expansions should be a municipally-led process where expansion should only be considered where compact, mixed-use development within the established settlement area can no longer accommodate a growing population.
- The approach to boundary expansion should provide certainty and stability for municipal planning. The current direction of evaluating boundary expansions through the MCR process is an appropriate tool to effectively evaluate such proposals.
- Easing permissions for small severances and lot line adjustments to create small buildings encouraging Additional Residential Units in rural areas outside settlements could help to create more rural housing, while avoiding significant farmland loss. As per the policies in the Growth Plan in municipalities like Halton Hills, growth shall be limited in areas that are not serviced by existing or planned municipal water and wastewater system and other municipal infrastructure such as public transit in order to achieve complete communities.
- 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.

- In the GTA, the policies under Growth Plan section 2.2.5.9 are crucial to ensure that sufficient employment lands are available to accommodate forecasted employment growth.

Attainable Housing Supply and Mix

- Allowing local planning authorities to set context-appropriate densities within their MTSAs would help create transit-oriented neighborhoods that better integrate into the surrounding community. In Halton Hills, Planning staff are currently undertaking such an analysis as part of ongoing Secondary Plan work within our Georgetown MTSA.

Growth Management

- The PPS and the Growth Plan serve different purposes in shaping Growth in Ontario. While the PPS is an overarching document serving all of Ontario the Growth Plan includes detailed policy direction for the GGH with a focus on building complete communities, prioritizing intensification and vibrant urban centres supported by provincial and local infrastructure to accommodate the anticipated population growth within this area. The Growth Plan focuses on a coordinating approach for addressing growth management challenges in the GGH which are significantly different than in the rest of the province. Any attempt to combine both documents must ensure that the key policies to assist with the above-mentioned objectives in the GGH are carried forward.
- Growth should focus on sustainable and compact development, that is pedestrian-friendly and maintains a connection to the natural environment. Intensifying suburban areas should be more than simply increasing housing supply. Provincial Policy direction should be promoting complete communities with accessible services in suburban neighborhoods. Improved walkability and accessible public transit will help to reduce the traffic impacts of an intensified suburb.

Environment and Natural Resources

- The offsetting policy being proposed under ERO posting 019-6161 appears to be Provincially-led, leaving little decision-making power to local planning departments and Conservation Authorities. This would be counter to “empowering local decision making” that is mentioned as part of this element. Avoidance and mitigation should be prioritized ahead of offsetting in the policy framework.
- 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. In the absence of Conservation Authority expertise, municipalities may be forced to increase project budgets and hire technical experts to complete technical analysis related to environmental planning.

Community Infrastructure

- Policies for school capacities should continue to be informed by School Boards. School Boards routinely plan for capacity increases in rapidly growing areas, and have existing mechanisms in place for addressing long-term planning and infrastructure needs (i.e., capital priorities process, Pupil Accommodation Review). It is unclear why this would become a core element in this policy framework.

Streamlined Planning Framework

- 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.

- Like many municipalities, Halton Hills is committed to engaging with the public. Through our Public Engagement Charter, we strive to seek out the most impacted by a proposed project and engage them meaningfully through the life of a project. The Provincial policy direction should continue to support local planning authorities in achieving this.
- Provincial direction on land use planning responsibilities should be finalized before setting out streamlining policies in this policy document.

Question 2: What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?

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. Housing should also be incentivized where a strong transit network is in place, or has been planned for.
- Provincial support for municipally-led Community Improvement Plans can help better connect housing developers to funding support for infrastructure revitalization, completing environmental site assessments, grants for planning and building permit fees, and costs associated with affordable housing development.
- 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.
- Greenfield area planning is focused on compact mixed-use development, that properly accounts for necessary servicing infrastructure enhancement and expansion. The Province should look to increase minimum density in greenfield areas from 50 people and jobs per hectare to 65. Doing so would encourage medium and high density housing forms.

Question 3: How should the government further streamline land use planning policy to increase the supply of housing?

Town staff support an approach to streamlining land use planning policies where:

- The Provincial mandate is for an efficient land use planning process, whereby duplication in submission requirements is avoided, and where the roles and responsibilities of approval authorities are clearly identified, do not overlap, and do not over-reach.
- The municipal role of addressing Climate Change through mitigation and adaptation measures continues to be respected (as set out in A Place to Grow section 4.2.10, and PPS section 1.8).
- 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.

Question 4: What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?

Policy concepts that should be retained from the current PPS and Growth Plan include, but are not limited to:

- Existing PPS framework support for building strong and healthy communities based on a mix of densities and land uses. Section 1.1.1 of the PPS identifies components of healthy,

livable and safe communities that include: efficient, mixed-use land use patterns; the integration of uses, and the need to address climate change.

- Current PPS policies prioritize intensification in built up areas. Intensification has the potential to provide more affordable units, while increasing the housing supply faster.
- Coordination is a component of the PPS that should remain so that some framework is in place for cooperation among government, agencies and boards to achieve desirable planning outcomes.
- Land use compatibility is another important component of the PPS. It is important that housing continue to be considered a sensitive land use, to be planned away from major industrial facilities.
- Key components of section 1.4 of the PPS on housing, including Affordable Housing, intensification targets and density, should remain. Additionally, the PPS should continue to direct new housing to where appropriate levels of infrastructure and public service facilities are available to support current and projected needs.
- Policies for public spaces, recreation and parks are somewhat limited in the current PPS, and should be strengthened in a new document.
- Existing policies on Cultural Heritage should be retained and strengthened in light of recent changes to the Ontario Heritage Act.
- Both the PPS and Growth Plan were recently amended to include a definition of 'Affordable' as it relates to home ownership and rental opportunities. The definition includes applying '30% of gross annual income spent on accommodation costs' as a measure of affordability. This definition, and this measure of affordability should continue to help inform Provincial policies on affordable housing.
- Policy framework for Station Areas, Employment and Greenfield Areas (2.2.4; 2.2.5; 2.2.7) in the A Place to Grow legislation should remain. These sections support intensification around transit, compact design, connectivity among people, goods and services, and complete communities in the GGH and align with similar objectives in the PPS.
- All PPS and Growth Plan policies with reference to mitigating impacts of climate change should remain. Additionally, the Province should reaffirm its commitment to addressing climate change by encouraging: the implementation of local Green Development Standards for housing development; planning for transit and active transportation; and efficiency and resiliency in the design of servicing infrastructure.

Question 5: What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?

Summary Comment:

- 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.
- For purposes of streamlining, clarification should be provided on the roles of the upper tier/lower tier planning authorities in this document as it relates to implementation.