

October 21, 2019

Planning Consultation
Provincial Planning Policy Branch
777 Bay Street
13th floor
Toronto, ON
M5G 2E5

To whom it may concern:

**RE: Provincial Policy Statement Review
ERO Posting #019-0279**

The Town of Wasaga Beach is grateful for the opportunity to provide feedback on the draft 2019 Provincial Policy Statement (PPS). As a rapidly growing community, having an open dialogue with the province is valuable to ensure our growth reflects the needs of our community, while being consistent with provincial interests. Generally, it is understood that the proposed changes to the PPS come as part of the sweeping legislation changes via Bill 108, including the Housing Supply Action Plan, More Homes, More Choice Act, and The Grow Plan (2019).

The Town's specific comments are presented below in a table with the proposed policies to be addressed on the left column, and the accompanying comments in the right column.

Policy	Comment
1.1.3.3 Planning authorities shall promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification...	Adding transit-supportive language to encourage intensification in this section and elsewhere in the PPS is helpful. It encourages broader policies that link alternative transportation options, increased residential densities, and walkability.
1.1.1 b) healthy and livable communities are sustained by accommodating an appropriate 'market-based' range and mix of residential types...	The term 'market' is used in a variety of contexts in the proposed PPS, primarily through the undefined term 'market-based'. It would be helpful to provide a definition and consistency with this language, to provide guidance for how to apply the terms 'market-based' and 'market-ready'.
1.1.3.8 a) settlement area expansions must demonstrate opportunities to accommodate growth and satisfy 'market demand' are not available...	
1.3.1 c) promote economic development	

<p>(employment) by facilitating the conditions for economic investment by... monitoring the availability and suitability of employment sites, including 'market-ready' sites...</p> <p>1.4.3 Provide for an appropriate range and mix of housing options and densities to meet project 'market-based needs'...</p> <p>1.7.1 b) long-term economic prosperity should be supported by encouraging residential uses to respond to dynamic 'market-based' needs...</p>	
<p>1.2.2 Change of language to "shall" from "are encouraged" regarding engagement with Indigenous communities and coordination on land use planning matters.</p> <p>2.6.5 Strengthening of language to engage with Indigenous communities and consider their interests when identifying, protecting, and managing cultural heritage and archaeological resources.</p>	<p>Municipalities would benefit from provincial guidance on best practices/tools for consultation, accommodation, and addressing the interests of Indigenous communities in the planning process.</p>
<p>1.6.7.5 Removal of the policy stating that transportation and land use considerations should be integrated at all stages of planning process.</p>	<p>The Town questions the rationale for removal of a policy that requires integration of transportation and land use in the planning process.</p>
<p>1.6.11.1 Energy Supply policies</p>	<p>District Energy should be a defined term in the PPS.</p>
<p>2.1.10 Policy allows municipalities to choose whether to manage wetlands that are not provincially significant i.e. 'locally significant' or 'unevaluated wetlands' in accordance with guidelines developed by the province.</p>	<p>The Province has indicated that they will be preparing new guidelines that reinforce the principal of no net loss for wetlands, to support the Made in Ontario Environment Plan. The Town would like to participate in the consultation program related to these guidelines prior to their approval.</p>

2.6.5	Planning Authorities shall engage with Indigenous communities and consider their interests when identifying, protecting and managing cultural heritage and archaeological resources.	Municipalities would benefit from further guidance on the engagement and consultation process.
3.0	Protecting Public Health and Safety (Natural Hazards)	The Town supports a broader review of flooding issues by the Province as a means of adapting to climate change and building community resilience to hazard events. The Town has significant interest in the ongoing review by the Province's Special Advisor on Flooding, which may result in further changes to policy and mapping.
<p>Change of language in particular areas to "prepare for impacts of a changing climate" and inclusion in more sections of the PPS</p> <p>3.1.3 Planning authorities shall prepare for the <i>impacts of a changing climate</i> that may increase the risk associated with natural hazards.</p> <p>Expanded use in: 1.1.3.2d; 1.6.6.1.b2; 2.2.1c,</p>		Adding reference to a changing climate, particularly regarding watershed systems and stormwater management, is useful to reinforce ways in which planning can address climate change.
4.7	Planning authorities shall take action to support increased housing supply and facilitate a timely and streamlined process for local development...	Town staff will be reporting separately to Council on ways in which the Town is able to streamline the planning and development process in Wasaga Beach.
Definition of <i>Designated Growth Area</i>		Though this definition has not been altered, it is quite similar to the definition of <i>Designated Greenfield area</i> in the Growth Plan (definition also not altered in the latest update). There should be greater consistency between these two provincial planning documents for these terms, to be clear about how they are interpreted.

The Town recognizes the need for affordable and attainable housing locally and across the Province. We agree that policy guidance from the Province has the potential to make meaningful impact on housing affordability. However, the proposed changes that modify the language regarding housing such as the undefined use of *market-based* may expose the Town

to growth demands in a manner that is inconsistent with other objectives of the province such as intensification, transit oriented development, and environmental protection. Additional clarity on the proposed policies that are of concern to the Town will aid in our efforts to meet the consistency requirements of our local planning documents.

Please take these comments into consideration in the finalization of the Provincial Policy Statement review.

Sincerely,

George Vadeboncoeur
Chief Administrative Officer

CC: Mayor and Council
Doug Herron, Director of Planning and Economic Initiatives