



Healthy watersheds for today
and tomorrow.

November 24, 2022

Via email and upload to the Environmental Registry of Ontario

Ms. Ewa Downarowicz, Director (A)
Planning Policy Branch
Ministry of Municipal Affairs and Housing
College Park 13th Floor
777 Bay Street
Toronto ON M7A 2J3

Dear Ms. Downarowicz:

**Subject: Central Lake Ontario Conservation Authority Comments for Consultation on Replacing the Provincial Policy Statement and Growth Plan
Environmental Registry of Ontario Notice Number 019-6177
CLOCA File# PGDP27**

At their meeting of November 23, 2022, the Central Lake Ontario Conservation Authority (CLOCA) Board of Directors passed the following Resolution:

Res. #65 ***Moved by R. Hooper***
Seconded by B. Nicholson

THAT the CLOCA Board of Directors considers Regional Municipal Planning in Durham, Natural Heritage and Water Conservation Policies, Exiting Natural Hazard Policies, and Watershed, Subwatershed and Stormwater Management Policies to be essential for the health and safety of present and future generations in Durham Region and not barriers to the supply of housing;

THAT the Province of Ontario should Focus on Provincial Policy Implementation, including technical support at the Ontario Land Tribunal, as opposed to further re-writing of high-level provincial policy;

THAT the Commentary in Staff Report #5804-22 and attachments be endorsed and submitted to the Province of Ontario and Conservation Ontario as CLOCA's comments regarding Environmental Registry Posting 019-6177;

THAT Staff Report #5804-22 be circulated to Watershed Municipalities with a request for endorsement of this resolution; and,

THAT Staff Report #5804-22 be circulated to Members of Provincial Parliament, Members of Parliament, Conservation Ontario and adjacent Conservation Authorities for their information.

CARRIED

Accordingly, please find the endorsed staff report and attachments enclosed with this letter for detailed commentary from CLOCA.

Please contact me if you have any questions with respect to this submission.

Yours truly,



Chris Jones, MCIP, RPP

Director of Planning and Regulation

CJ/lv

Encl. CLOCA Staff Report 5804-22 and attachments

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DATE: November 22, 2022
FILE: PGDP27
S.R.: 5804-22
TO: Chair and Members, CLOCA Board of Directors
FROM: Chris Jones, Director, Planning and Regulation
SUBJECT: **Provincial Consultation on Replacing Provincial Policy Statement and Growth Plan**

APPROVED BY C.A.O. 

Purpose

The purpose of this report is to introduce a new provincial land use planning policy consultation and provide commentary for submission to the province under the *Environmental Bill of Rights* Registry.

Background: New Provincial Consultation on Replacing the *Provincial Policy Statement, 2020* and *A Place to Grow, Growth Plan for the Greater Golden Horseshoe* with a “new province-wide planning policy instrument”

On October 25, 2022, the Ministry of Municipal Affairs and Housing (MMAH) posted notices on the *Environmental Registry of Ontario* launching a consultation on a “housing-focused policy review” of *A Place to Grow* and the *Provincial Policy Statement*. The stated intention of the ministry is to seek input on how to “create a streamlined province-wide land use planning policy framework that enables municipalities to approve housing faster and increase housing supply.” It is understood that this would result in a “new province-wide planning policy document” in place of the provincial-scale *Provincial Policy Statement* and the regional-scale *A Place to Grow* plan. **Attachment No. 1** to this Report contains the full registry posting for full details.

The *Provincial Policy Statement, 2020* (PPS)

The current PPS was issued by the current government and took effect on May 1, 2020 as part of a *Housing Supply Action Plan*. CLOCA took part in 2019 consultations leading to the PPS. Staff last reported to the CLOCA Board on the PPS via Staff Report 5685-20, which was received for information on May 12, 2020.

The current PPS is a comprehensive statement of the Ontario government’s policies on land use planning and is issued under section 3 of the *Planning Act*. It applies province-wide and sets out critical basic provincial policy direction to achieve sustainable and positive outcomes from development in relation to the following policy areas for which CLOCA has a watershed-related policy or regulatory interest:

- **Protecting the environment and resources** including farmland, natural resources (e.g., wetlands and woodlands) and water; and
- **Protecting people and property** by directing development away from natural hazards – such as flood prone areas.

Municipal Councils must ensure that their decisions that affect planning matters are consistent with the PPS. CLOCA, as public commenting body, must also ensure that its comments on planning matters are consistent with the PPS. Through a memorandum of understanding, the ministries of Municipal Affairs and Housing, Natural Resources and Forestry and Conservation Ontario, CLOCA represents the “provincial interest” with respect to the natural hazards policies in the PPS as an integrated public commenting body as part of the land use planning system in Durham Region. For reference, the Table of Contents to the PPS is included in **Attachment No. 2** to this Report.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan)

The Growth Plan is a provincial land use plan for the Greater Golden Horseshoe Region issued under the *Places to Grow Act, 2005*. It works with the provincial *Greenbelt Plan*, *Oak Ridges Moraine Conservation Plan*, and the *Niagara Escarpment Plan* to provide a more detailed land use policy framework than the provincial-scale PPS for where and how growth should be accommodated in the Greater Golden Horseshoe

Critically, for the CLOCA watershed and municipalities, the Growth Plan provides essential environmental protection directions for our quickly urbanizing region. These currently include:

- managing growth including intensification targets, minimum densities for new development, integration with watershed planning and hazard management;
- water resource system and natural heritage system identification and planning;
- strong protections for key hydrologic features (i.e. wetlands and watercourses) and key natural heritage features (i.e. woodlands and Valleylands) for portions of the countryside that do not have Greenbelt Plan protections; and
- Climate Change.

The current government most recently updated the Growth Plan in August 2020 as part of a *Housing Supply Action Plan*. For reference, the Table of Contents to the Growth Plan is included in **Attachment No. 3** to this Report.

Consultation Proposal

The government is proposing to replace the PPS and Growth Plan into a new “province-wide planning policy instrument” that integrates elements of the current policy statement and regional growth plan. The stated outcome the ministry is seeking is to “determine the best approach that would enable municipalities to accelerate the development of housing ... through a more streamlined, province-wide land use planning policy framework.” It is also stated that the new policy instrument would “[continue] to protect the environment... and public health and safety...”

The ministry has set out various ‘core elements’ that a new provincial policy instrument could include. The following summarizes the most relevant core elements that relate to CLOCA’s watershed-related policy and regulatory interests:

- **Settlement Area Boundary Expansions** – policies enabling municipalities to expand their settlement area boundaries more easily;
- **Rural Housing and Agriculture** – policies enabling more residential development in rural areas;
- **Natural Heritage** – streamlined direction across Ontario, empowering local decision making and more options to reduce development impacts;
- **Natural Hazards** – streamlined and clarified direction for development in hazard areas, continuing to protect people and property in areas of ‘highest risk.’

Consultation Questions

To structure a response to the proposal, the ministry has set out five (5) consultation questions. The questions and staff’s analysis and recommended response are included as **Attachment No. 4** to this report.

Summary Analysis and Conclusion

CLOCA's response to the consultation questions includes the following:

- Regional municipal planning in Durham has been longstanding and effective: the province must carry-forward critical elements of regional and watershed-scale planning;
- Essential natural heritage and water conservation policies for our present and future health are not, and should not be, framed as barriers to the supply of housing: the province must carry-forward existing natural heritage and water policy;
- Existing provincial natural hazards directions are vital aspects of public policy that protect people's lives, their safety and their property; they are not in any way barriers to the supply of safe housing: the province must carry forward existing natural hazard policy;
- Key watershed, subwatershed and stormwater management policies should be retained;
- Policy certainty is needed: the province should stop frequently changing high-level provincial policy directions but rather focus on implementation through guidance and timely and accessible support from all relevant ministries, including the Ontario Land Tribunal.

RECOMMENDATION:

THAT the CLOCA Board of Directors considers Regional Municipal Planning in Durham, Natural Heritage and Water Conservation Policies, Existing Natural Hazard Policies, and Watershed, Subwatershed and Stormwater Management Policies to be essential for the health and safety of present and future generations in Durham Region and not barriers to the supply of housing;

THAT the Province of Ontario should Focus on Provincial Policy Implementation, including technical support at the Ontario Land Tribunal, as opposed to further re-writing of high-level provincial policy;

THAT the Commentary in Staff Report #5804-22 and attachments be endorsed and submitted to the Province of Ontario and Conservation Ontario as CLOCA's comments regarding Environmental Registry Posting 019-6177;

THAT Staff Report #5804-22 be circulated to Watershed Municipalities with a request for endorsement of this resolution; and,

THAT Staff Report #5804-22 be circulated to Members of Provincial Parliament, Members of Parliament, Conservation Ontario and adjacent Conservation Authorities for their information.

Attachment 1 – Environmental Registry of Ontario Posting 019-6177, Review of A Place to Grow and Provincial Policy Statement

Attachment 2 – Table of Contents, Provincial Policy Statement, 2020

Attachment 3 – Table of Contents, A Place to Grow, Growth Plan for the Greater Golden Horseshoe, 2020

Attachment 4 – CLOCA Response to Consultation Questions

Review of A Place to Grow and Provincial Policy Statement

ERO (Environmental Registry of Ontario) number	019-6177
Notice type	Policy
Act	Places to Grow Act, 2005
Posted by	Ministry of Municipal Affairs and Housing
Notice stage	Proposal
Proposal posted	October 25, 2022
Comment period	October 25, 2022 - December 30, 2022 (66 days) Open
Last updated	October 25, 2022

This consultation closes at 11:59 p.m. on:

December 30, 2022

Proposal summary

The Ministry of Municipal Affairs and Housing (MMAH) is undertaking a housing-focused policy review of A Place to Grow and the Provincial Policy Statement. MMAH is seeking input on how to create a streamlined province-wide land use planning policy framework that enables municipalities to approve housing faster and increase housing supply.

Proposal details

Context

Everyone in Ontario should be able to find a home that is right for them. But too many people are struggling with the rising cost of living and with finding housing that meets their family's needs.

Ontario's housing supply crisis is a problem which has been decades in the making. It will take both short-term strategies and long-term commitment from all levels of government, the private sector, and not-for-profits to drive change.

Attachment 1

Each entity will have to do their part to be part of the solution to this crisis.

Ontario needs more housing, and we need it now. That's why the Ontario government is taking bold and transformative action to get 1.5 million homes built over the next 10 years.

To support Ontario's More Homes Built Faster: Ontario's Housing Supply Action Plan: 2022-2023, the government introduced the More Homes Built Faster Act, 2022, which, if passed, would ensure that cities, towns, and rural communities grow with a mix of ownership and rental housing types that meet the needs of all Ontarians. These visionary changes will place Ontario at the forefront of housing policy in North America.

These changes are providing a solid foundation to address Ontario's housing supply crisis over the long term and will be supplemented by continued action in the future.

The Provincial Policy Statement, 2020 (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (A Place to Grow) both provide comprehensive, integrated, whole-of-government policy direction on land use planning matters including:

- 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.

Both policy documents aim to support the achievement of liveable communities, a thriving economy, a clean and healthy environment and social equity, improving the quality of life for all Ontarians.

The PPS is issued under the *Planning Act* and is the primary provincial land use planning policy document, applying across Ontario. A Place to Grow is a growth plan issued under the *Places to Grow Act, 2005*. It works with the Greenbelt

Attachment I

Plan, Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan to provide a more detailed framework for where and how growth should be accommodated in the Greater Golden Horseshoe.

Provincial plans build upon the policy foundation of the PPS, providing additional land use policy direction to address issues facing specific geographic areas of Ontario. All provincial plans are to be read in conjunction with the PPS.

Under the Planning Act, planning decisions shall be consistent with policy statements such as the PPS and shall conform with provincial plans like A Place to Grow.

Policies of the PPS are outcome-oriented, and some policies allow flexibility in their implementation provided that the original intent of the policy is upheld.

Planning decisions under A Place to Grow must demonstrate that provincial direction is explicitly satisfied, such as including specific population and employment forecasts in official plans, to ensure provincial interests are protected across the Greater Golden Horseshoe.

The policies of A Place to Grow take precedence over the policies of the PPS in the event of any conflict, except where the relevant legislation provides otherwise. Where matters addressed in the PPS do not overlap with policies in A Place to Grow, those PPS policies must be independently satisfied.

The current land use planning policy framework in Ontario has evolved over the last three decades. As new policy requirements and provincial plans have been added, longstanding requirements have generally not been removed, particularly for policies that apply to the Greater Golden Horseshoe. What remains is a complex system of overlapping policy instruments that can be difficult to navigate and implement.

Given the importance of the PPS and A Place to Grow 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 in the next ten years.

Proposal

Attachment I

The government is proposing to integrate the PPS and A Place to Grow into a new province-wide planning policy instrument that:

- Leverages the housing-supportive policies of both policy documents;
- Removes or streamlines policies that result in duplication, delays or burden in the development of housing;
- Ensures key growth management and planning tools are available where needed across the province to increase housing supply and support a range and mix of housing options;
- Continues to protect the environment, cultural heritage and public health and safety; and
- Ensures that growth is supported with the appropriate amount and type of community infrastructure.

The intended outcome of this review is to determine the best approach that would enable municipalities to accelerate the development of housing and increase housing supply (including rural housing), through a more streamlined, province-wide land use planning policy framework.

The core elements of this new policy instrument could include the approaches outlined below:

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

Attachment I

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

Attachment I

making, and providing more options to reduce development impacts, including offsetting/compensation (**Proposed Updates to the Ontario Wetland Evaluation System** (<https://ero.ontario.ca/notice/019-6160>))

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 (**Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 (Schedule 6) - the Proposed More Homes Built Faster Act, 2022** (<https://ero.ontario.ca/notice/019-6196>))

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

Questions:

Attachment I

1. What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?
2. What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?
3. How should the government further streamline land use planning policy to increase the supply of housing?
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?
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?

The intent of this consultation is to identify potential opportunities that will complement other provincial priorities and plans. Should this consultation result in impacts to additional provincial plans, beyond the PPS and A Place to Grow, other consultations may take place in the future.

Analysis of Regulatory Impact:

- The anticipated regulatory impacts of the proposal may vary in the short-term, depending on the status of a municipality's work to update their official plan. Over time, it is anticipated that the impacts would be positive as the proposed changes are intended to create a streamlined province-wide land use planning policy framework that provides greater flexibility for municipalities to approve housing faster and increase housing supply. While there are no new administrative costs associated with this proposal, depending upon when new policy is brought into effect, some municipalities in the process of updating official plans may experience additional administrative costs if they are required to revise their work.

Supporting materials

Related links

[More Homes, More Choice: Ontario's Housing Supply Action Plan \(2019\)](https://www.ontario.ca/page/more-homes-more-choice-ontarios-housing-supply-action-plan)
(<https://www.ontario.ca/page/more-homes-more-choice-ontarios-housing-supply-action-plan>).

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[Planning Act \(https://www.ontario.ca/laws/statute/90p13\)](https://www.ontario.ca/laws/statute/90p13)

[Provincial Policy Statement, 2020 \(https://www.ontario.ca/page/provincial-policy-statement-2020\)](https://www.ontario.ca/page/provincial-policy-statement-2020)

[Places to Grow Act, 2005 \(https://www.ontario.ca/laws/statute/05p13\)](https://www.ontario.ca/laws/statute/05p13)

[A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2019 \(https://www.ontario.ca/document/place-grow-growth-plan-greater-golden-horseshoe\)](https://www.ontario.ca/document/place-grow-growth-plan-greater-golden-horseshoe)

Related ERO (Environmental Registry of Ontario) notices

[Consultations on More Homes Built Faster: Ontario's Housing Supply Action Plan 2022-2023 \(/index.php/notice/019-6162\)](/index.php/notice/019-6162)

[Proposed Updates to the Ontario Wetland Evaluation System \(/index.php/notice/019-6160\)](/index.php/notice/019-6160)

[Proposed Changes to the Ontario Heritage Act and its regulations: Bill 23 \(Schedule 6\) - the Proposed More Homes Built Faster Act, 2022 \(/index.php/notice/019-6196\)](/index.php/notice/019-6196)

View materials in person

Some supporting materials may not be available online. If this is the case, you can request to view the materials in person.

Get in touch with the office listed below to find out if materials are available.

Comment

Let us know what you think of our proposal.

Have questions? Get in touch with the contact person below. Please include the ERO (Environmental Registry of Ontario) number for this notice in your email or letter to the contact.

[Read our commenting and privacy policies. \(/page/commenting-privacy\)](/page/commenting-privacy)

Attachment 1

Submit by mail

growthplanning@ontario.ca

Provincial Land Use Plans Branch

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Canada

**Connect with
US**

Contact

growthplanning@ontario.ca

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A Place to Grow

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Attachment No. 4: Provincial Consultation Questions and Responses

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

CLOCA Response:

Carry-forward Critical Elements of Regional and Watershed-Scale Planning

The proposed core elements must be understood in the context of the significant policy shift that would be imposed on Durham Region whereby both the longstanding and effective regional municipal planning function is to be abolished and the provincial Greater Golden Horseshoe-scale Growth Plan is to be removed and replaced with one provincial-scale set of policies. The proposed core elements must retain key elements of regional planning including: (1) planning for the watershed scale including protections from adverse downstream impacts from flooding and erosion; (2) urban growth boundaries; (3) regional-scale natural heritage systems including regional-scale natural heritage and water resource system protections. To ensure housing supply objectives do not undermine the fundamental goal of complete and livable communities, these three core elements of regional planning, for Durham Region and the CLOCA watershed, must be carried forward in a future province-wide land use planning policy instrument.

Carry-forward Provincial Natural Heritage and Water Policy

The current Provincial Policy Statement (PPS) recognizes that: *"Ontario's long-term prosperity, environmental health, and social well-being depend on conserving biodiversity, protecting the health of the Great Lakes, and protecting natural heritage, water, agricultural, ... resources for their economic, environmental and social benefits."* This statement remains extremely valid for present and future generations. Accordingly, there must continue to be specific policy direction in a future planning policy instrument that will achieve essential conservation and protection objectives in relation to natural heritage and water. Further, essential natural heritage and water conservation policies for our present and future health are not barriers to the supply of housing.

The current PPS contains streamlined and basic natural heritage protections that must be carried forward. These include: a requirement to identify natural heritage systems in southern Ontario; prohibiting development and site alteration in **"significant wetlands," "significant coastal wetlands," "significant woodlands," "significant valleylands," "significant wildlife habitat," "significant areas of natural and scientific interest," "coastal wetlands," "fish habitat," and "habitat of endangered species and threatened species."** A requirement to evaluate adjacent lands prior to development and site alteration taking place must also be carried forward to maintain the basic integrity of natural heritage systems and features planning.

Regarding water, existing basic directions to protect, improve or restore the quality and quantity of water are essential and must be carried forward. These include: “using the **watershed** as the ecologically meaningful scale for integrated and long-term planning ... [and] considering **cumulative impacts** of development,” “evaluating and preparing for the **impacts of a changing climate** to water resource systems at the watershed level,” “identifying **water resource systems**” and “maintaining **linkages**... among ... features,” “... restrictions on development and site alteration to **protect all municipal drinking water supplies** and designated vulnerable areas...” “ensuring stormwater management practices **minimize stormwater volumes** and contaminant loads and maintain or increase the extent of vegetative and pervious surfaces.”

Regarding the Growth Plan, key environmental protections for Greater Golden Horseshoe Water Resource Systems, including requirements for **watershed planning**, Natural Heritage Systems, Key Hydrologic Features and Areas, and Key Natural Heritage Features, including adjacent lands, and Climate Change should be retained, especially in the proposed absence of regional municipal planning by the Region of Durham.

Carry-forward Provincial Natural Hazard Policy

The current Provincial Policy Statement (PPS) recognizes that: “*Ontario's long-term prosperity, environmental health and social well-being depend on reducing the potential for public cost or risk to Ontario's residents from natural ... hazards.*” And further: “*Development shall be directed away from areas of natural ... hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.*” And finally that: “*Mitigating potential risk to public health or safety or of property damage from natural hazards, including the risks that may be associated with the impacts of a changing climate, will require the Province, planning authorities, and conservation authorities to work together.*”

Nothing in the preceding statements should be viewed as optional, discretionary, or disposable in today's Ontario. They are vital aspects of public policy that protect people's lives, their safety and their property and are not in any way barriers to the supply of safe housing. Accordingly, there must continue to be specific policy direction in a future policy instrument that will reduce risk to people from natural hazards, direct development away from hazards, not create new, or aggravate existing, hazards and address the increased risks presented by the climate crisis.

The current PPS contains streamlined and basic natural hazard policy directions that must be carried forward. These include: in accordance with provincial technical guidance, **directing development to areas outside of hazardous lands** adjacent to the shorelines of the Great Lakes with flooding, erosion and/or dynamic beach hazards and adjacent to river and stream systems with flooding and/or erosion hazards.

Specific policy concepts such as the “**floodway**,” and the “**one-zone**” and “**two-zone**” flood plain based on the **regulatory storm** event must continue. Given the ongoing climate crisis, directions to “prepare for the **impacts of a changing climate** that may increase the risk associated with natural hazards” must be kept in current form or strengthened.

Retain Key Long-Range Integrated Infrastructure Planning Directions

The current PPS recognizes that “*Efficient land use and development patterns support sustainability by promoting strong, liveable, healthy and resilient communities, protecting the environment and public health and safety, and facilitating economic growth.*”

Current PPS implementing policy direction directs that “an **integrated and comprehensive approach** should be used when dealing with planning matters within municipalities, across ... municipal boundaries and with other ... agencies and boards [such as conservation authorities] including: ... development that is integrated with infrastructure planning ... **managing natural heritage, water... ecosystem, shoreline, watershed and Great Lakes related issues, natural hazards...**” These directions should continue along with specific infrastructure policies that currently exist directing that: “infrastructure ... shall be provided ... that prepares for the **impacts of a changing climate...** promote[s] **green infrastructure...**” Specific direction for **planning for stormwater management** contained in PPS Policy 1.6.6.7 should be retained.

Long-term economic prosperity directions to “**[minimize] negative impacts from a changing climate** and [consider] the ecological benefits provided by nature” along with climate change direction to develop in a manner that will “**maximize vegetation** within settlement areas, where feasible” should be retained.

Regarding the Growth Plan, the policy direction to **verify the feasibility of Settlement Area Boundary Expansions** with respect to **avoidance of potential negative impacts on watershed conditions** is critical for safe and orderly growth (Growth Plan Policy 2.2.8.3). Further, precise stormwater management directions should be carried forward to a new planning policy instrument, including directions that large-scale development will be supported by a stormwater management plan that is informed by a **subwatershed plan** or equivalent especially in the proposed absence of regional municipal planning in Durham Region.

Balance Flexibility and Support Speed with Policy Certainty and Precision

It is understood that the province is seeking to introduce new flexibility and facilitate speedier decisions with a new provincial planning policy instrument. Both objectives could be reasonably supported by providing more certainty and precision with respect to provincial policy directions.

The current PPS, 2020 is just over 24 months old and was introduced as part of a *Housing Supply Action Plan*. Previously, the province had indicated that the PPS would only be under review after a 10-year period to allow for stability and an ability to monitor and evaluate implementation. The current Growth Plan was issued in August 2020 following previous significant revisions in 2019 and 2017. Now both the PPS and Growth Plan are proposed to be replaced by another planning policy instrument. These frequent revisions and issuances of provincial land use planning policy have eroded certainty regarding land use planning policy direction and require implementing bodies to continually revise their workplans for effective local implementation. The province should commit to policy certainty for a defined period of time following the issuance of the new planning policy instrument to allow municipalities and others the ability to focus on implementation with certainty.

Clear, precise policy language and, most importantly for implementation, up-to-date implementation guidance would facilitate both flexibility and speed. For example, the province should define minimum vegetation protection zones or buffers for all significant natural heritage features. Regarding environmental policy, the province has neglected to provide timely updates to the *Natural Heritage Reference Manual* and related guidance (there is no manual to support the 2020, PPS, for example) or with respect to *Natural Hazards* (current information supports the 1996/7 PPS and is from 2001 era). Both up-to-date guidance and continual implementation support would provide more of a return than a policy re-write. If, as proposed, a new provincial planning policy instrument is issued, comprehensive, and precise implementing guidance must be provided concurrently with the issuance of the new instrument. If the government is unable to provide implementing guidance upon the release of a new policy instrument, it should not issue a new policy until it is ready to articulate, with precision, how that policy is to be implemented in various contexts.

Finally, to aid local implementation, the province should maintain the principle that both provincial policy and guidance represent “minimums” upon which local decision-makers may build upon to suit their local conditions and needs.

Honour 10-year Commitments Regarding Greenbelt and Oak Ridges Moraine Plans

Further to the commentary in the preceding paragraphs regarding certainty, there is a statutory 10-year review of the Greenbelt Plan pursuant to section 10 of the Greenbelt Act, 2005 and related legislation. The current *Greenbelt Plan, 2017* represents the culmination of the 10-year review that began on the 10-year anniversary of the Greenbelt Plan in 2015. Areas of Protected Countryside should not be open to removal outside of the 10-year review, which should not take place until 2027. Opening up the Greenbelt and Oak Ridges Moraine Conservation Plans in advance of the 10-year review does not provide the policy consistency necessary to undertake rational planning and growth management decisions. The statutory 10-year review of the Greenbelt Plan should be honoured for any proposals to remove lands from the Protected Countryside.

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

CLOCA Response:

Minimum affordable housing targets combined with a program to finance the construction of affordable housing units directly, minimum densities, intensification targets, infrastructure investments, urban form shaping policies such as Urban Growth Centres, and Major Transit Station Areas are all valuable to both minimize land consumption and focus housing supply where infrastructure exists or will be efficiently built in the future with no, or minimal loss, of existing natural heritage or expansion into CLOCA watershed headwaters. However, CLOCA defers any detailed response to this question to our municipal partners at the Region of Durham and watershed municipalities.

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

CLOCA Response:

Comprehensive up-to-date implementation guidance with ongoing implementation support would further streamline land use planning policy. Regarding environmental policy, the province has neglected to provide timely updates to the Natural Heritage Reference Manual and related guidance (there is no manual to support the 2020, PPS, for example) or with respect to Natural Hazards (current information supports the 1996/7 PPS and was last published in 2001 but dates from the 1980's/early 1990's era). Both up-to-date guidance and continual implementation support would provide more of a return than a policy re-write. If, as proposed, a new provincial planning policy instrument is issued, comprehensive, and precise implementing guidance must be provided concurrently with the issuance of the new policy instrument. If the government is unable to provide implementing guidance upon the release of a new policy instrument, it should not issue a new policy until it is ready to articulate, with precision, how that policy is to be implemented in various contexts. Finally, policy certainty is needed: the province should stop frequently changing high-level provincial policy directions but should rather focus on implementation through guidance and timely and accessible support from all relevant ministries, including the Ontario Land Tribunal.

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**?

CLOCA Response:

Policies that effectively manage growth and structure urban form to provide efficient development patterns that optimize the use of land to reduce further horizontal urbanization should be retained. More efficient development patterns that are compact and appropriately dense also promote a mix of housing while also addressing conservation objectives.

Within the PPS, the hierarchy of accommodating residential growth for a minimum of 15 years first through residential intensification and redevelopment as a priority and then only in newly designated growth areas should be retained or strengthened (1.4.1). Establishing and implementing minimum targets for housing which is affordable to low and moderate income households should be retained or strengthened (1.4.3). Policies encouraging transit-supportive development and residential intensification should also be retained or strengthened (1.8.1 e)).

The planning horizon, which was recently extended to 25 years from 20, should not be extended further.

Within the Growth Plan, minimum greenfield densities and intensification targets should be retained and increased to provide more supply and make more efficient use of land. The concept of urban growth centres and major transit station areas with related policy directions should also be retained and strengthened.

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?

CLOCA Response:

The current PPS contains basic and essential provincial policy concepts to build strong and healthy communities, the wise use and management of resources, and protection of public health and safety in the province. The Growth Plan provides essential growth management, infrastructure and environmental protection direction for the Greater Golden Horseshoe region. As noted above, another suite of policy changes to foundational and basic land use policy at the provincial level will likely not have a great return on the supply of housing but will create more uncertainty over the short-term and will cause delay. What is needed is timely, accurate and capable implementation support from the province's land use ministries.

Comprehensive up-to-date implementation guidance with ongoing implementation support would further streamline land use planning policy. If, as proposed, a new provincial planning policy instrument is issued, comprehensive and precise implementing guidance must be provided concurrently with the issuance of the new policy instrument. If the government is unable to provide implementing guidance upon the release of a new policy instrument, it should not issue a new policy until it is ready to articulate, with precision, how that policy is to be implemented in various contexts.

Once issued, ongoing support through a program of on-going guidance memoranda and timely and accessible support from all relevant ministries, including at the Ontario Land Tribunal, if necessary, will be required. The province should focus on its technical support capabilities to maintain the research behind guidance materials and provide implementation support, as opposed to the frequent use of higher-level policy changes, as has been practiced in recent years.