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Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
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Email: growthplanning@ontario.ca

RE: Ministry of Municipal Affairs and Housing ERO Posting: Review of Proposed Policies Adapted from A Place to Grow and Provincial Policy Statement to Form a New Provincial Planning Policy Instrument) – ERO Posting No. 019-6813

Thank you for the opportunity to comment on the release of the proposed Provincial Planning Statement through ERO Posting No. 019-6813. Staff understand that the proposal is for an integrated province-wide land use planning document that takes policies from A Place to Grow and the Provincial Policy Statement to support the achievement of housing objectives.

Township of King Growth Management Services Department – Planning Division Staff have provided comments on the proposed policy concepts and proposed wording for the proposed 2023 PPS. Staff have also provided responses to the questions for consideration detailed in the ERO Posting. Responses to the questions are included in Appendix A to this Letter.

The Township's Growth Management Services Department – Planning Division reserves the opportunity to provide additional comments and/or modify the comments contained herein as the review of the proposed 2023 PPS progresses.

Local Official Plans and the role of Upper-tier Municipalities (Municipal Comprehensive Reviews)

Staff request that the proposed language be revised to provide more policies that support natural heritage protection, climate change mitigation and adaption, employment growth, affordable housing development, and support intensification in locally appropriate areas. Land supply alone is not sufficient to solve the issue of affordable housing. The proposed 2023 PPS should also be revised to direct and require local municipalities to define affordable housing in local official plans and set targets to achieve the desired outcomes.

The proposed vision in the 2023 PPS states "*More than anything, a prosperous Ontario will see the building of more homes for all Ontarians*". The language "more than anything" places such a strong emphasis on one element of communities and does not provide a balanced approach to sustainable and complete communities. Staff are supportive of the Province's goal to provide more housing, however, providing housing for all Ontarians should not come at the expense of the natural environment, employment, and socio-cultural matters, including affordable housing.

The proposed 2023 PPS may provide for more local autonomy in developing approaches to accommodating growth with requirements for density, intensification, employment, and affordable



housing targets removed; however, it is recognized those targets were aimed at achieving sustainable and complete communities in a coordinated and fiscally responsible manner.

Complete Communities, Density and Intensification Targets

Staff encourage the Province to consider retaining policies to require each municipality to develop locally appropriate minimum density targets to encourage the development of complete and sustainable communities.

The removal of intensification targets and most density targets may provide more autonomy to local municipalities; however, this makes it difficult to provide for a coordinated approach to growth. The lack of intensification targets may make it difficult to plan for community and infrastructure needs, particularly at the Regional level for water and wastewater servicing and transit. The removal of the intensification target within the built-up area may encourage sprawl-like development which in turn may result in more car dependent communities.

At the municipal level, developing and defending intensification targets, without a mandatory policy direction may be challenging if there is community resistance to intensification. The policies would appear to encourage the redevelopment of existing commercial and institutional uses rather than intensifying existing residential areas in appropriate locations. The potential loss of non-residential lands and lost opportunities to encourage varied housing forms and densities would be detrimental towards developing complete communities as envisioned by the Township's Official Plan.

Strategic Growth and Major Transit Station Areas

Staff request that all current major transit station areas be carried forward under the proposed 2023 PPS, including those outside of “large and fast-growing municipalities”.

As the Township is not identified as a large and fast-growing municipality, it appears that the Township's current MTSA for the King City GO Station would not be carried forward under the proposed PPS as an MTSA that requires delineation. While the Township would be able to delineate it and set a density target, it would not be informed by Provincial policy or direction. This may hinder the Township's ability to encourage intensification in proximity to transit which does not support the goal and vision of the creation of complete communities.

The approach to strategic growth areas, MTSA's and large and fast-growing municipalities should be further reviewed by the Province as the proposed changes create a patchwork approach towards growth management across the Province and between adjacent municipalities, allowing for them to develop on an ad hoc basis that promotes unmanaged growth and sprawl.

Settlement Area Boundary Expansions

Staff request clarification from the Province as to whether the policies of A Place to Grow that prevent settlement area boundary expansions within the Greenbelt Area will continue to apply through the proposed changes.

With the proposed removal of planning responsibilities from upper-tier municipalities it is unclear whether the approval authority for settlement area boundary expansions is the lower-tier municipality or the Minister. It is also unclear how the proposed policies align with the Greenbelt Plan as the proposed amendments to the Greenbelt Plan have not been released for review and comment.

Employment Land and Conversions

Staff request that the Province consider revising the proposed policies to allow the removal of employment lands only through a municipally initiated official plan review (which takes place every 5 to 10 years), and not through privately initiated applications at any time during the planning horizon.

Increasing the tax base with the development of vacant Employment lands in each of the three Villages remains a goal for the Township. The increased flexibility to request and permit employment land conversions, together with the re-definition of area of employment, will require the Township to strategically evaluate (through the next Official Plan Review) the location and amount of employment lands necessary to achieve the Township's desired outcomes.

In York Region, servicing capacity for employment lands are factored into the calculated capacity of the system and do not require capacity assignment, unlike residential uses which do require capacity assignment. Conversion of employment lands to residential has the potential to place more demand on limited servicing capacity allocation, and to negatively impact the residential/non-residential assessment base.

Agricultural Areas

Staff request that the Province reconsider the proposed changes to permit lot creation for residential uses within prime agricultural areas.

The proposed 2023 PPS provides that up to three residential dwelling units are permitted on a prime agricultural lot, one for the principal dwelling unit and up to two additional residential dwelling units. Planning Staff do not have any concerns with additional residential units, provided that they are ancillary to and subordinate in size to the principal use. Staff have concerns with the proposed policies that would allow the additional dwelling units to be severed from the principal dwelling unit and primary agricultural use. This form of lot creation would result in the loss of land for agricultural use, where lands have been identified as being most suited to agriculture.

Providing for additional residential units in the countryside aids in building a complete rural community by providing diversity in the housing stock and for providing opportunities for multi-generational housing, aging in place and/or rental housing. However, the proposed PPS does not limit the size the dwellings and as such the policies may encourage the development of larger residential lots within the agricultural area, thereby also removing more land from agricultural production. In addition to removing more lands from agricultural production, the increased number of rural residential uses may present more conflicts for farmers. Some day-to-day farm practices can lead to nuisances or disturbances including odours, noise, and dust. **Staff request that should the Province move ahead with these policies in the proposed PPS, direction should be provided for local municipalities to develop a maximum lot area size and to encourage lands to remain in agricultural production.**

Staff also request clarification from the Province as to whether the additional residential units that are severed from the principal dwelling and agricultural operation are then permitted additional residential units themselves.

Climate Change

Staff request that the Province include the policies from A Place to Grow that support the achievement of complete communities, recognize the importance of watershed planning and protecting the natural heritage system and water resource systems, promote local food and protect the agricultural land base to ensure that municipalities are undertaking a comprehensive and responsive approach to climate change.

Land use planning and the development of land for residential uses can impact the natural environment through such things as increased impervious surfaces, the loss of vegetation and the potential for increased greenhouse gas emissions where the development is not compact and does not utilize transit and active transportation. Climate change adaptation, mitigation, and increased resiliency, as identified in A Place to Grow, should be reflected in the 2023 PPS.

Further, the changes in Provincial direction in respect to the removal of density and intensification targets conflict with the objectives for climate change as envisioned in the Provincial policies. **Staff request that the Province retain the policies related to intensification and density targets to encourage housing and redevelopment in proximity to services and to discourage unmanaged growth and sprawl.**

Natural Heritage

Staff request that the Province not proceed with any changes to the PPS and A Place to Grow until the proposed Natural Heritage policies are released to allow for a comprehensive review of the proposed changes.

It is unclear what, if any, changes to policies related to the natural heritage and the natural heritage system will be as the proposed policies have not yet been released for review. Staff highlight that streamlining the review of development applications to encourage the increase of housing supply should not come at the expense of environmental protection, natural heritage preservation and biodiversity. **Staff encourage the Province to include policies in the 2023 PPS that continue to prevent or limit encroachment from urban development into the natural heritage system.**

Alignment with the Greenbelt Plan

Staff request that the Province not proceed with any changes to the PPS and A Place to Grow until the proposed amendments to the Greenbelt Plan are released to allow for a comprehensive review of the proposed changes.

While the draft 2023 PPS identifies that the Greenbelt Plan takes precedence in situations of conflict, the Greenbelt Plan relies on many policies in A Place to Grow for direction, including in relation to settlement area expansions. The Province has released an Implementation document for the draft 2023 PPS that states that the policies of the current PPS and A Place to Grow would continue to apply in those cases where the Greenbelt Plan refers to them. However, it is unclear how the policies will continue to apply if A Place to Grow is repealed entirely.

Cultural Heritage

Staff request that the Province reconsider the changes to the definitions for heritage resources, attributes and properties to encourage non-designated properties and landscapes to be conserved.

The policy direction of the proposed 2023 PPS indicates that only “designated” properties and landscapes shall be conserved. Non-designated properties (i.e., Listed properties) with potential cultural heritage value or interest in the process of evaluation and review will have no further consideration for conservation until they are designated. The proposed PPS 2023 should be enhanced by adding non-designated properties to the definition of “protected heritage property” to ensure that these excluded properties are acknowledged and recognized as important cultural heritage resources worthy of conservation.

The policies related to development adjacent to heritage properties is also proposed to be changed and narrowed in scope as to what can be considered an adjacent property. The removal of the policies in the proposed 2023 PPS would reduce the area in which the Township can request for evaluations or study documents (i.e., Heritage Impact Assessments, etc.) which may be useful in determining appropriate mitigation measures required for projects with sensitive heritage properties in high development areas.

Township Planning Staff looks forward to continuing its participation in this review and to our comments and recommendations being considered and addressed. We look forward to hearing from you in this regard.



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Yours sincerely,

A handwritten signature in blue ink, appearing to read "Kristen Harrison".

Kristen Harrison, MCIP, RPP
Manager of Policy Planning

cc. Daniel Kostopoulos, Chief Administrative Officer
Mayor Pellegrini and Members of Council
Stephen Naylor, Director of Growth Management Services
Gaspare Ritacca, Manager of Planning and Development
Jamie Smyth, Manager of Economic Development
Aloma Dreher, Senior Planner – Policy

Attachments

Appendix A: Response to Questions for Consideration, dated May 29, 2023