



October 21, 2019

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

RE: Provincial Policy Statement Review – Proposed Policies (ERO # 019-0279)

Please accept this letter in response to the Environmental Registry of Ontario – ERO #019-0279 Provincial Policy Statement Review, Proposed Policies. The Town of Caledon is appreciative of the opportunity to provide initial comments on the above ERO posting. These comments have been endorsed by Council.

While Town staff are supportive of directions of the proposed PPS policies that would increase housing supply, create and maintain jobs and cut red tape while continuing to protect the environment, farmland, and public health and safety, they have significant concerns with several of the proposed policy changes which may result in negative impacts on the Town's ability to provide positive planning outcomes for its residents. Staff also contend with a lack of clarity to the PPS provisions and/or conflicts between the PPS and other planning legislation.

Our comments are outlined under the key themes of the proposed amendments/modifications:

1. Increasing Housing Supply and Mix

New policies in the PPS suggest municipalities shall increase the planning horizon from 20 to 25 years and increase housing land supply from 10 to 12 years. Upper- and single-tier municipalities will be required to maintain a 5-year supply of serviced residential lands. The Province aims to provide a "Projection Methodology" as guidance to support land budgeting.

- Staff does not support the increased planning horizon to 25 years as this impacts the well-established conformity date of 2022. The increased timeframes will significantly impact ongoing planning projects at the Town such as the Official Plan Amendment for the Mayfield West Phase 2 Stage 2 lands and the Official Plan Review 2041 project. The Town of Caledon, in cooperation with the Region of Peel, have been using the 2041 population and employment forecasts on Schedule 3 to achieve conformity. The Town recommends that the current planning horizon and forecasts be maintained so that technical work that has already been completed to date is not lost. The proposed timeline in the PPS differs from the A Place to Grow, 2019 timelines, which will likely result in the Province making further changes to the Growth Plan if the PPS is approved with the increased planning horizon. These changes may also lead to the Province amending the employment forecasts to align with the new horizon.
- In direct response to the question posed by the Province – "are there any other tools that are needed to help implement the proposed policies?"; staff is concerned that the "Projection Methodology" continues to be delayed. Without this essential guidance material, the Region of Peel and the Town of Caledon cannot move forward with the municipal comprehensive review and required settlement area boundary

expansions, which delays the provision of housing supply and hinders the Town's ability to meet 2022 conformity date.

In terms of transit-supportive development, there are new policies that prioritize intensification in proximity to transit stations and corridors including potential air rights development. Conversely, the language surrounding transit-supportive development has been softened by shifting many "shall" statements to "should" statements for provisions related to transit-supportive development.

- Staff is not supportive of the softening of language around the integration of transportation and land use planning at all stages of the planning process. Transportation and land use planning are critical components of the planning process and one cannot be planned without the other. Staff recommends that the previous stronger policy language remain in the PPS.

There is an emphasis placed on market-based housing supply and demand to provide housing options across the spectrum, which includes policies that require municipalities to align affordable housing targets with Housing and Homelessness Plans. References are also made to compact form and phasing.

- Staff is concerned with the requirement that planning authorities provide for an appropriate range and mix of housing options and densities to meet projected "market-based needs" of current and future residents, as this does not consider the comprehensive, integrated and long-term nature of planning to facilitate complete communities or emerging demographic trends. "Market-based needs" approach to housing exclusively looks at current and past trends in the market and this is a significant departure from the previous PPS, which required planning authorities to encourage a range and mix of residential housing, regardless of what the market would support. This approach may add a profitability test to building complete communities. Town recommends removal of the terms "market-based needs" and "market demand."
- The focus on "market-based needs" and "market demand" is likely to embolden development applications that replicate past development trends, rather than encouraging creative approaches to solve urban/rural issues the Town is facing, as they will likely be able to support known built forms with sales records.

2. Protecting the Environment and Public Safety

While the policies contained in the proposed PPS enhance the importance of climate change adaptation efforts, language surrounding climate mitigation has been minimized and/or removed. Policies directing municipalities to consider waste generation implications and opportunities for renewable energy in land use planning processes were removed and/or amended.

- The removal of the policies will marginalize efforts to focus on both mitigation and adaptation through effective land use planning policies and environmental strategies. It is much more cost effective to invest in low carbon infrastructure now for new development, rather than make expensive investments in existing development in the future.
- The reduced emphasis on climate change mitigation relative to the previous PPS is concerning, given the urgency of the issue and the potential economic opportunities that municipalities can gain from greater energy efficiency, alternative energy systems and renewable energy generation. In particular, land use decisions made today will 'lock in' greenhouse gas emissions and other environmental impacts for decades.

3. Reducing Barriers and Costs

New policies would require municipalities to fast-track priority development applications for certain proposals which support housing and job-related growth.

- The open interpretation of “fast-tracking” and “priority applications” is vague and further entrenches the assumption of municipal delays in planning and development approval processes.
- The lack of clear direction and definitions regarding “fast-tracking” and “priority applications” may result in significant additional demands placed on Town staff and resources to process planning applications. Given the growth that is anticipated for Caledon with Mayfield West and Bolton Residential Expansion Area, a large percentage of applications may be required to be considered “fast-track” applications. An over-abundance of “fast-track” applications may result in either the requirement of additional staffing resources or an inability of Town staff to provide an adequate level of review to ensure high quality developments that incorporate complete community design.

New policy allows mineral aggregate extraction to occur in protected, provincially significant natural features, including wetlands, woodlands, valley lands, wildlife habitats, fish habitats, endangered and threatened species habitats and areas of natural and scientific interest outside of the Greenbelt, subject to certain policies and where it is demonstrated that extractions will have no negative impacts.

- These extraction policies don’t take into consideration the long-term effects of developing within protected features. These policies may result in inadequate protection and loss of significant natural heritage features.
- The Town has 26 existing mineral aggregate operations and an abundance of mineral aggregate resource areas that, if allowed to expand into protected features, will have an impact on the Town’s ability to cope with climate change impacts, especially considering that our Caledon climate forecast model predicts more extreme heat days and increased precipitation. Wetlands and naturally forested areas act to moderate and buffer against the impacts of extreme rainfall (e.g. overland and riverine flooding) and extreme temperatures (e.g. urban heat island effect).

Policy adjustments were made to align cultural heritage policies of the PPS with the recent changes to the Ontario Heritage Act. The PPS proposes to change the definition of “significant” as it pertains to cultural heritage resources.

- The proposed definition of “significant” as it relates to cultural heritage resources will allow the Province to determine what features constitute cultural heritage value. Clarification of the definition of “significant” is paramount to the recognition of cultural heritage resources as this directs the requisite knowledge base for recognizing attributes that define either a building or cultural landscape and/or heritage features that are associated with cultural heritage resources.

4. Supporting Rural, Northern and Indigenous Communities

New policies allow for greater flexibility for communities to select individual on-site sewage services and individual on-site water when municipal services are not available, planned or feasible in rural settlement areas at the time of Official Plan review or update.

- Although the Region of Peel is the provider of water and wastewater services, Town staff is concerned that broader policies for water and wastewater servicing in rural settlement areas will lead to increased development pressures in parts of the Greenbelt, Oak Ridges Moraine and the Niagara Escarpment. The Town has several rural settlements that may be candidates for alternative servicing options. This includes areas like Palgrave Estates and several villages including Alton and Caledon Village. These changes to the PPS 2019 leave the Town with fewer tools to manage growth and development.

5. Supporting Certainty and Economic Growth

New policies allow municipalities to permit employment land conversions outside of comprehensive review at the time of an Official Plan review and aligns with the changes in *A Place to Grow, 2019*.

- Staff is generally supportive of allowing conversions of employment lands to non-employment uses, outside of a comprehensive review subject to criteria and at the completion of an Official Plan Review. Staff suggest the lands should also be accounted for at the comprehensive review stage. This policy change aligns with employment policies in *A Place to Grow, 2019*. However, these changes also contradict other policies in the PPS 2019 that aim to enhance protection of employment lands to maintain their feasibility and viability (i.e. 1.3.2.1).

6. Additional Comments

New wording in the preamble section of the PPS describes the role of municipal Official Plan and Zoning By-laws within the context of implementation. The PPS also adds new wording around circumstances where approvals under the Planning Act may require an integrated planning process and approvals process under other legislation such as the Environmental Assessment Act. The “shall be consistent with” policy as it relates to comments, submissions or advice regarding planning matters provided by council of a municipality, was reduced from a numbered policy to a general statement. There is new wording that clarifies the relationship between the PPS and other Provincial Plans.

- The Town recommends that policies that speak to the legislative authority of the PPS and implementation should be given more weight and remain as numbered policies to remove the ambiguity of local and Provincial policy compliance.

Moving forward, Town staff hope the Province provides substantially more time and resources to analyze the impacts of Provincial policy and to be invited to participate in a consultation that is responsive to the concerns of Ontario’s municipalities.

If you have any comments or require clarification, please do not hesitate to contact the undersigned.

Sincerely,

Peggy Tollett
General Manager
Community Services

c: Adrian Smith, Region of Peel