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REVIEW OF THE PROVINCIAL POLICY STATEMENT, 2005

The Planning and Economic Development Committee recommends the adoption of the recommendations contained in the following report dated December 8, 2010, from the Commissioner of Planning and Development Services.

1. RECOMMENDATIONS

It is recommended that:

1. Regional Council endorse the attached staff comments on the Environmental Bill of Rights (EBR) posting entitled Review of the Provincial Policy Statement, 2005 (EBR No. 010-9766) as submitted on October 28, 2010.
2. The Regional Clerk forward this report to the Minister of Municipal Affairs and Housing.
3. The Regional Clerk circulate this report to local municipalities, the Lake Simcoe Region Conservation Authority and the Toronto and Region Conservation Authority.

2. PURPOSE

The purpose of this report is to advise Council of the Review of the Provincial Policy Statement, 2005 and obtain Council endorsement of the comments by staff.

3. BACKGROUND

The Province is undertaking a review of the Provincial Policy Statement, 2005 (PPS) to determine the need for revisions

The PPS Review was placed on the EBR on May 12, 2010 and republished August 10, 2010 to extend the comment period to October 29, 2010. The purpose of the EBR consultation was to inform the public that the Province is reviewing the PPS for the purpose of determining the need for revisions.

The PPS is issued under the authority of Section 3 of the *Planning Act* and came into effect on March 1, 2005. The PPS plays a key role in Ontario's land use planning system by providing policy direction on matters of provincial interest. It is the basis of the Province's policy-led planning system and provides the foundation necessary to regulate the development and use of land. The PPS applies province-wide and provides the policy

basis upon which provincial plans such as the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan are built.

The *Planning Act* requires that decisions on planning matters made by municipalities, the Province, the Ontario Municipal Board and other decision-makers “shall be consistent with” the PPS.

The PPS recognizes the complex inter-relationships among economic, environmental, cultural and social factors in land use planning, and embodies good planning principles.

The PPS includes major policy areas around communities, resources, and public health and safety

Building Strong Communities

The PPS provides policy direction to help build strong communities in Ontario through, for example:

- the effective management and use of land to meet current and future needs
- the protection of employment areas and other policies to promote economic development and competitiveness
- the provision of a range of housing types (including affordable housing) and densities to meet the needs of current and future residents
- the availability of appropriate infrastructure, e.g., transportation systems, and sewer and water services, to accommodate projected needs
- the promotion of energy efficiency and minimizing negative impacts to air quality.

Wise Use and Management of Resources

The PPS protects Ontario’s natural heritage (e.g., wetlands and woodlands), water, agricultural, mineral, petroleum, mineral aggregate, cultural heritage and archaeological resources. The protection of these important resources helps to ensure Ontario’s long-term prosperity, environmental health and social well-being.

Protecting Public Health and Safety

The PPS protects people, property and community resources by directing development away from natural or human-made hazards (e.g., flood plains or contaminated lands).

4. ANALYSIS AND OPTIONS

Staff provided comments to the Province on October 28, 2010

Regional and local municipal staff provided comments to the Province's EBR posting on October 28, 2010 (see *Attachment 1*). The comments describe the major themes that should be reviewed and incorporated to ensure that the PPS adequately addresses provincial interests, the inter-relationship between land use planning and the natural environment, economy, and sustainable healthy communities, as well as emerging issues that both the Province and municipalities must address.

At a minimum, the PPS needs to be updated to reflect recent Provincial plans and legislation

As an overall statement, at a minimum, the PPS needs to be updated to reflect more recent Provincial Plans and legislative changes impacting land use since 2005, for example:

- *Places to Grow Act* and Plan
- *Greenbelt Act* and Plan
- *Clean Water Act*
- *Lake Simcoe Protection Act* and Plan
- *Green Energy Act*

The PPS takes somewhat of a “one size fits all” approach to planning in municipalities across Ontario. The *Places to Grow Act* and Plan and the *Greenbelt Act* and Plan, as examples, have fundamentally changed the way planning is done in the GTAH region.

The PPS needs to reflect the different planning requirements and recognize the needs and real differences between municipalities across the province. It also needs to be updated to reflect current thought and work around sustainable, active and healthy communities where people can live, work, play and learn in an accessible and safe environment. The PPS needs to broaden its scope to require more affordable housing choices, and consider how we plan for such things as an aging and diverse society, climate change and renewable energy.

The Province also needs to engage municipalities and stakeholders in a meaningful way in drafting a new PPS and in the implementation of the policies.

Introduce Sustainability into the PPS

York Region encourages the Province to create a new PPS that takes a “triple-bottom line approach” to sustainability that will enable municipalities to fully evaluate the separate and interdependent aspects of economic, environmental and community considerations.

Sustainable, healthy communities:

- Promote active lifestyles which are accessible to all
- Meet the diverse needs of residents of all ages, cultures, abilities and income levels
- Include a diversity of jobs and affordable housing
- Provide quality schools and child care options, public spaces, recreation facilities and other amenities
- Provide linked natural heritage systems
- Provides community design that promotes active lifestyles, human interaction, safety and accessibility
- Protects heritage and cultural resources
- Achieve the highest standard in urban design and green building
- Provide safe, accessible mobility systems that prioritize pedestrian and cycling connections, public transit and streets
- Protect and ensure access to clean air, water and healthy locally grown food

Sustainable Natural Environment: A new PPS can encourage a provincially linked and protected natural heritage system

A new PPS can provide the basis on which a provincially linked and protected natural heritage system can be expanded on and strengthened.

In addition to natural heritage systems, urban forests provide a number of ecological services that are consistent with provincial objectives, including direct health benefits through carbon sequestration, reduction of urban heat island effect, reduced energy costs and greenhouse gasses, provide habitat for urban wildlife, improve biological diversity and provide green spaces for recreational use and enjoyment.

York Region recommends that the Province build on key policy documents already in place like the Greenbelt Plan to ensure that natural systems are restored, protected, and/or enhanced in a comprehensive systems approach across the Province, and that the PPS policies reflect this by taking into consideration:

- That a healthy natural environment is a key consideration in human health and well-being
- That municipalities must plan for, and implement, a healthy urban forest within their communities
- There is a need to make a connection between protection of water in the natural environment and drinking water source protection as part of a systems approach that focuses on restoration and enhancement
- There is a need to maintain and enhance publicly and privately owned forested lands
- That there is a need for municipal Permit to Take Water (PTTW) tools to manage water resources
- That there is an important interrelationship between community health, environmental health and land use planning.

Healthy Communities: land use decisions are connected to human health and wellbeing

As identified in the PPS “a policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic and social factors in land use planning” and “supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas”. Land use planning decisions are connected to human health and wellbeing by the way they influence our housing choices, our air quality and our level of physical activity.

Our current built form adversely affects the health of our residents, as shown by increasing rates of obesity, diabetes, cardiovascular disease, respiratory illness, traffic injuries and exposure to contaminants. The key factor to addressing these adverse health outcomes is by changing the built environment and the way in which buildings, parks, schools, road systems and other infrastructure are designed.

The PPS must include consideration of climate change impacts and community vulnerabilities to climate change. Using land use planning as a tool to mitigate the impacts of extreme heat events, flooding, and emerging diseases, is an important step in protecting our communities. Climate change adaptation warrants its own policy area in the PPS, or alternately, climate change adaptation should be recognized as a guiding principle of this document.

Finally, the Province has an active role to play in the provision and development of housing, especially as it relates to urban growth centres, and to specific policy areas like affordable and special needs housing. A policy permitting secondary suite development as of right, supported by updates to the Ontario Building and Fire Codes would assist municipalities in meeting the Province’s intensification targets.

Economic Vitality: longer term planning horizons are needed to plan for and protect employment lands and green infrastructure

Efficient land use and development patterns support strong, liveable and healthy communities, protect the environment and public health and safety, and facilitate economic growth.

The PPS requires planning authorities to promote economic development and competitiveness, however, the PPS does not allow municipalities to protect employment lands beyond planning periods. In addition, a commitment is needed in the PPS to provide a Provincially directed employment and residential land needs forecast methodology.

The PPS should:

- Provide a mechanism to identify and protect longer term employment lands beyond 2031
- Emphasize sustainable, innovative development, green infrastructure and green built forms and a green economy
- Support Regional Centres and Corridors as a focus of economic activity and culture/employment areas accessible by public transit, active transportation
- Clarify that major retail uses should not be allowed on employment lands and provide a definition on what constitutes a major retail use
- Recognize that investment in multi-modal transportation systems is integral to Ontario's long term economic prosperity.

In addition to these comments provided to the Province on the EBR, senior staff from York Region met with Ministry of Municipal Affairs and Housing ADMs on June 14, 2010, around the impacts and recommended directions arising from the 2010 North Leslie OMB Decision. Comments to the Province during that meeting included:

- With a maximum 20 year planning horizon for employment lands, the longer term protection of strategic employment lands is trumped by the “insatiable” demand for residential uses.
- The requirement for a 10 year supply of residential land “per planning jurisdiction” creates difficulty for municipalities reaching full build-out to protect their future employment lands.
- Absence of heightened Provincial priority for employment lands, particularly adjacent to 400 series highways, undermines protecting for longer term employment lands.
- A Provincially directed employment and residential land needs forecast methodology should be formalized to support the Places to Grow conformity exercises.
- Long term protection of strategic employment lands beyond the 20 year planning horizon is required – prioritize employment lands to create a level playing field with other land use demands.
- A Provincial policy is required that declares a Provincial Interest in Strategic Employment lands in the Greater Toronto Area.

Building Cities: strengthen urban agenda to support urban centres and intensification of corridors

The GTAH continues to experience rapid growth and this growth will need to be managed in a sustainable way that ensures a high quality of life for residents. The Province needs to provide strong direction and vision for our future communities through Provincial plans, legislation and policies put in place since the PPS 2005.

The PPS needs to advance and strengthen the urban agenda to support urban growth centres, intensification corridors a major transit station areas. The PPS can reflect this by:

- Requiring longer time horizons (found in earlier versions of the PPS) or allowing for flexibility in planning time horizons based on issues being considered around natural heritage, infrastructure, transit, energy and employment features
- Providing common density and intensification measurements, definitions and monitoring tools
- Supporting intensification and redevelopment, including brownfield development that utilizes existing infrastructure and reduce the need for greenfield development.

Complete Communities: strengthen focus on compact urban form to support pedestrians, cycling and transit

Stronger policies and standards need to focus on compact urban form that supports pedestrians, cycling, and transit for daily activities, and provides a diverse and compatible mix of land uses including residential and employment uses to support socially inclusive, environmentally sustainable and economically vibrant communities.

The PPS needs to provide direction on creating sustainable communities through practices such as coordinating and sequencing development with the provision of infrastructure, transit and human services, creating high standards for urban design considering such things as winter design, mitigation of urban heat island effects, urban greening, and innovative energy and water conservation and management.

The PPS can reflect this by:

- Requiring compact urban form that supports pedestrians, cycling, and transit for daily activities
- Focusing on building more sustainable communities that link land use planning with innovative energy generation and supply
- Providing more focus on urban ecosystem protection and enhancement and urban greening
- Ensuring that “food deserts” are not created by ensuring comprehensive community planning
- Require linkages between residential and employment growth
- Requiring a diverse and compatible mix of land uses including residential and employment to support socially inclusive, environmentally sustainable and economically vibrant communities
- Requiring coordination and sequencing of development with provision of infrastructure, transit and human services

Agricultural and Rural Areas: support local agriculture and access to local food

Rural areas are important to the economic and social viability of both York Region and the Province.

In addition, access to a safe, secure food supply is a basic human right. The PPS must support agricultural activities across the province to ensure that food sources and agricultural production remain available locally and to provide support to local organizations in order to assist farmers in bringing locally grown and produced food and other agricultural products from farm to table.

The PPS should:

- Address near urban agriculture
- Permit broader range of supportive secondary uses
- Include policies to support local food production, markets, etc.
- Clarify provisions of the ORMCP with respect to alternative energy systems and renewable energy systems
- Within the Holland Marsh Specialty Crop Area, balance continued agricultural production and potential expansion with natural heritage values and policies
- Proactively assess, encourage and promote policies and programs directed to the production, distribution and use of local food by residents and business
- Consider related and supportive farm uses (for e.g. agri-tourism, farm-gate sales, community gardens and other near urban agricultural practices) in areas outside of Provincial Plan areas (e.g. Greenbelt, ORMCP), i.e. future urban area agriculture areas such as the whitebelt.

Servicing Our Population: Consider transportation at the pedestrian scale earlier in the planning process

In order for sustainable development to succeed, transportation needs to be considered at the onset of the planning process. Transportation corridors are part of the public realm that serve to create a unique sense of place and community. Designing in and around these corridors at the pedestrian scale is therefore fundamental to supporting not only investments in infrastructure such as transit, but also the quality of life in the surrounding community.

The Province has already made significant gains in addressing the tension between land use planning and transportation planning through the Growth Plan for the Greater Golden Horseshoe (Growth Plan) and the Metrolinx Regional Transportation Plan (RTP): The Big Move. While the RTP provides the basis to achieve the Growth Plan's objectives, it is the responsibility of the PPS to ensure that the priority objectives of the Growth Plan, the RTP and the Greenbelt Plan are fully integrated in a manner that provides clear interpretation and consistent implementation.

As we understand it, the Ministry of Transportation is developing a Transportation Provincial Policy Statement separate from the PPS. This separation will lengthen the process of effective integration between transportation and land use planning. We are concerned that strategically significant areas such as mobility hubs would not reach their full potential without a concurrent and coordinated planning process.

The PPS should:

- Ensure concurrent land use and transportation planning
- Emphasize reducing demand for services
- Encourage development that allows people to walk or bike to meet their daily needs, produce less greenhouse gas emissions and promote a smaller carbon footprint, and improves better air quality and quality of life
- Provide tools to support the development and promotion of active transportation as part of a healthy, active lifestyle
- Provide tools to support transit and to ensure that rapid transit is provided to service the pace of development
- Encourage developers to ensure that accessibility is improved for seniors, children and individuals with special needs and providing the necessary amenities for these groups to access alternative modes such as transit, walking and cycling
- Ensure that the spatial distribution of land uses and the design of development support transit, walking and cycling
- Support Provincially identified Mobility Hubs as key destinations for all transportation modes and major locations for high density development including residential, employment, ICI and recreational uses, and further define Provincial interest and activities to support these
- Provide direction for better alignment of transportation initiatives at a Provincial, regional and local level
- Support and implement multi-modal systems that provide seamless transportation mode integration
- Provide tools to protect key transportation corridors and tools to assess local airsheds to inform land use and transportation planning processes (As identified in the Environmental Commissioner of Ontario's Annual Report released Sept 22, 2010)
- Recognize the importance of parking management to increase transit and active transportation mode share
- Require Transportation Demand Management as a development application requirement to ensure that all new development and redevelopment, including residential, ICI, retail and educational uses are pedestrian, bicycle and transit oriented, accessible and affordable
- Reflect the Province's work on moving towards zero waste reduction and require multi-residential three stream waste management and ICI waste reduction
- Promote demand management and alternative energy systems and renewable energy systems such as solar, wind, water, biomass, geothermal energy, energy-from-waste, local generation and district energy facilities.

Relationship to Vision 2026

Vision 2026 in addition to York Region's Sustainability Strategy support the policy directions of the PPS including healthy, safe, vibrant communities, economic vitality and sustainable natural environment. In addition, improvements to the PPS based on staff recommendations will support the implementation of the Regional Official Plan as well as the Sustainability Strategy.

5. FINANCIAL IMPLICATIONS

It is anticipated that the Province's ongoing review of the PPS will require staff time during review and consultation, this can be accomplished within the allocated budget.

6. LOCAL MUNICIPAL IMPACT

The Region's local municipalities were consulted and a number provided support and additional comments to those outlined in *Attachment 1*. It is anticipated that a future review of the PPS will require local municipal staff time for review and input, however if the PPS is updated to include improvements recommended by staff, this will assist the local municipalities in implementing both the Region's Official Plan as well as local municipal official plans.

7. CONCLUSION

Regional and local municipal staff provided comments in response to the Environmental Registry Posting (EBR 010-9766) regarding the Review of the Provincial Policy Statement, 2005 on October 28, 2010.

The comments describe the major themes that should be reviewed and incorporated to ensure that the PPS adequately addresses provincial interests, the inter-relationship between land use planning and the natural environment, economy, and sustainable healthy communities, as well as emerging issues that both the Province and municipalities must address.

As an overall statement, at a minimum, the PPS needs to be updated to reflect more recent Provincial Plans and legislative changes impacting land use since 2005.

The PPS takes somewhat of a "one size fits all" approach to planning in municipalities across Ontario. The *Places to Grow Act* and Plan and the *Greenbelt Act* and Plan, as examples, have fundamentally changed the way planning is done in the GTAH region.

The PPS needs to reflect the different planning requirements and recognize the needs and real differences between municipalities across the province. It also needs to be updated to reflect current thought and work around sustainable, active and healthy communities where people can live, work, play and learn in an accessible and safe environment. The PPS needs to broaden its scope to require more affordable housing choices, and consider how we plan for such things as an aging and diverse society, climate change and renewable energy.

The Province also needs to engage municipalities and stakeholders in a meaningful way in drafting a new PPS and in the implementation of the policies.

Detailed comments regarding the current PPS, 2005 policies have been provided
Attachment 1.

For more information on this report, please contact Laura Atkins-Paul, Senior Planner at (905) 830-4444 Ext. 1534 or John Waller, Director of Long Range and Strategic Planning at (905) 830-4444 Ext. 1525.

The Senior Management Group has reviewed this report.

(The attachment referred to in this clause is attached to this report.)



BRYAN W. TUCKEY

Commissioner
Planning and Development Services Department

October 28, 2010

Kyle MacIntyre
Manager (A)
Ministry of Municipal Affairs and Housing
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Provincial Planning Policy Branch
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M5G 2E5

Re: EBR Registry #010-9766 Review of the Provincial Policy Statement, 2005

Thank you for the opportunity to comment on the Provincial Policy Statement (PPS), 2005 as part of the Province's review.

As an overall statement, at a minimum, the PPS needs to be updated to reflect more recent Provincial Plans and legislative changes impacting land use since 2005, for example:

- Places to Grow Act and Plan
- Greenbelt Act and Plan
- Clean Water Act,
- Lake Simcoe Protection Act and Plan
- Green Energy Act

The PPS as it stands now takes somewhat of a "one size fits all" approach to planning in municipalities across Ontario. The Places to Grow Act and Plan and the Greenbelt Act and Plan, as examples, have fundamentally changed the way planning is done in the GTAH region. It is time for the PPS to reflect the different planning requirements and recognize the needs and real differences between municipalities across the province. It also needs to be updated to reflect current thought and work around sustainable, active and healthy communities where people can live, work, play and learn in an accessible and safe environment. The PPS needs to broaden its scope to require more affordable housing choices, and consider how we plan for such things as an aging and diverse society, climate change and renewable energy.

The following is a summary of the comments provided by staff from the Community and Health Services, Transportation Services, Environmental Services, Corporate Energy, Legal, Economic Development and Planning Department staff and a number of our local municipalities. This letter describes the major themes that should be reviewed and incorporated to ensure that the PPS adequately addresses provincial interests, the inter-

relationship between land use planning and the natural environment, economy, and sustainable healthy communities, as well as emerging issues that both the Province and municipalities must address.

What is equally important is how the Province can engage municipalities and stakeholders in drafting a new PPS and in the implementation of the policies. Once the Province has considered all the input and proposed new directions for the PPS, it would be very helpful if the Province releases a PPS discussion paper, and that continued engagement with municipalities occurs in a meaningful manner.

Detailed comments regarding the current PPS, 2005 policies have been provided in the attached table and have been organized by topic area as found in the Provincial Policy Statement, 2005.

Sustainability and Planning Policy

York Region encourages the Province to create a new PPS that takes a “triple-bottom line approach” to sustainability that will enable municipalities to fully evaluate the separate and interdependent aspects of economic, environmental and community considerations.

Sustainable, healthy communities:

- Promote active lifestyles which are accessible to all
- Meet the diverse needs of residents of all ages, cultures, abilities and income levels
- Include a diversity of jobs and affordable housing
- Provide quality schools and child care options, public spaces, recreation facilities and other amenities
- Provide linked natural heritage systems
- Provides community design that promotes active lifestyles, human interaction, safety and accessibility
- Protects heritage and cultural resources
- Achieve the highest standard in urban design and green building
- Provide safe, accessible mobility systems that prioritize pedestrian and cycling connections, public transit and streets
- Protect and ensure access to clean air, water and healthy locally grown food

York Region is using this “triple bottom line approach” to evaluate a number of key emerging trends facing York Region and much of the Province, including:

- an aging society
- a culturally and economically diverse society
- an urbanizing region defined by vibrant centres
- the impact of the built environment on public health and social cohesion among and within communities including consideration of green spaces, water conservation, climate change, energy conservation and renewable sources of energy
- societal health issues such as obesity, mental illnesses, and cardiovascular and respiratory diseases.

Sustainable Natural Environment

As the PPS currently states, “the diversity and connectivity of natural features across the Province, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored (we suggest adding “and enhanced”) or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features”. A new PPS can provide the basis on which a provincially linked and protected natural heritage system can be expanded on and strengthened.

In addition to natural heritage systems, urban forests provide a number of ecological services that are consistent with provincial objectives, including direct health benefits through carbon sequestration, reduction of urban heat island effect, reduced energy costs and greenhouse gasses, provide habitat for urban wildlife, improve biological diversity and provide green spaces for recreational use and enjoyment.

York Region recommends that the Province build on key policy documents already in place like the Greenbelt Plan to ensure that natural systems are restored, protected, and/or enhanced in a comprehensive systems approach across the Province, and that the PPS policies reflect this by taking into consideration:

- That a healthy natural environment is a key consideration in human health and well-being
- That municipalities must plan for, and implement, a healthy urban forest within their communities
- There is a need to make a connection between protection of water in the natural environment and drinking water source protection as part of a systems approach that focuses on restoration and enhancement
- There is a need to maintain and enhance publicly and privately owned forested lands
- That there is a need for municipal Permit to Take Water (PTTW) tools to manage water resources
- That there is an important interrelationship between community health, environmental health and land use planning.

Healthy Communities

As identified in the PPS “a policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic and social factors in land use planning” and “supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas”. The Ontario Public Health Standards recognizes that these same complex interactions significantly influence the health of individuals and communities – social and economic factors, the physical environment, and individual behaviours and conditions. These factors are referred to as the determinants of health.¹ Land use planning decisions are connected to the determinants of health by the way they influence our housing choices (social factor), our air quality (physical factor) and our level of physical activity (individual behaviour).

Our current built form adversely affects the health of our residents, as shown by increasing rates of obesity, diabetes, cardiovascular disease, respiratory illness, traffic

injures and exposure to contaminants. The key factor to addressing these adverse health outcomes is by changing the built environment and the way in which buildings, parks, schools, road systems and other infrastructure are designed. It is extremely important that public health and planning professionals work closely together on issues that impact health and the built environment.

The PPS recognizes that land use must be planned to meet current and future needs. Part of this planning must include consideration of climate change impacts and community vulnerabilities to climate change. More and more, municipalities are considering climate change impacts in their land use planning in order to increase the resiliency of their infrastructure – water and wastewater systems, bridges, buildings, etc. It is important that communities also identify and address the vulnerabilities of their residents. Land use planning to mitigate the impacts of extreme heat events, flooding, and emerging diseases, is an important step in protecting our communities. Climate change adaptation warrants its own policy area in the PPS, or alternately, climate change adaptation should be recognized as a guiding principle of this document, with policies threaded throughout the various sections of Part V - Policies.

Finally, the Province has an active role to play in the provision and development of housing, especially as it relates to urban growth centres, and to specific policy areas like affordable and special needs housing. A policy permitting secondary suite development as of right, supported by updates to the Ontario Building and Fire Codes would be very helpful in assisting municipalities in meeting the Province's intensification targets.

In terms of healthy community policies in the PPS, it is recommended that the PPS:

- Be updated to reflect sustainable, healthy, active and accessible communities
- Commit to a Provincial Housing Strategy and require more affordable housing choices
- Consider an aging and diverse society, climate change and renewable energy
- Ensure that human services and housing are located on major transit lines
- Encourage universal accessibility
- Ensure separation of sensitive uses from sources of significant air pollution
- Provide guidance on land use planning for climate change.

Economic Vitality

Ontario's long-term prosperity, environmental health and social well-being depend on wisely managing change and promoting efficient land use and development patterns. Efficient land use and development patterns support strong, liveable and healthy communities, protect the environment and public health and safety, and facilitate economic growth.

The PPS requires planning authorities to promote economic development and competitiveness, however, the PPS does not allow municipalities to protect employment lands beyond planning periods. In addition, a commitment is needed in the PPS to provide a Provincially directed employment and residential land needs forecast methodology.

The PPS should:

- Provide a mechanism to identify and protect longer term employment lands beyond 2031
- Emphasize sustainable, innovative development, green infrastructure and green built forms and a green economy.
- Support Regional Centres and Corridors as a focus of economic activity and culture/employment areas accessible by public transit, active transportation
- Clarify whether major retail uses are a non-employment use and provide a definition on what constitutes a major retail use
- Recognize that investment in multi-modal transportation systems is integral to Ontario's long term economic prosperity

Building Cities

As the Province's Places to Growth Plan for the Greater Golden Horseshoe points out, the GTAH continues to experience rapid growth. This growth will need to be managed in a sustainable way that ensures a high quality of life for residents. The Province needs to provide strong direction and vision for our future communities through Provincial plans, legislation and policies put in place since the PPS 2005.

The PPS needs to advance and strengthen the urban agenda to support urban growth centres, intensification corridors a major transit station areas.

The PPS can reflect this by:

- Requiring longer time horizons (found in earlier versions of the PPS) or allowing for flexibility in planning time horizons based on issues being considered around natural heritage, infrastructure, transit, energy and employment features
- Providing common density and intensification measurements, definitions and monitoring tools
- Supporting intensification and redevelopment, including brownfield development, that utilizes existing infrastructure and reduce the need for greenfield development.

Complete Communities

The PPS needs to set high standards for sustainable community and economic development and protection of the natural environment. Stronger policies and standards need to focus on compact urban form that supports pedestrians, cycling, and transit for daily activities, and provides a diverse and compatible mix of land uses including residential and employment uses to support socially inclusive, environmentally sustainable and economically vibrant communities.

The PPS needs to provide direction on creating sustainable communities through practices such as coordinating and sequencing development with the provision of infrastructure, transit and human services, creating high standards for urban design considering such things as winter design, mitigation of urban heat island effects, urban greening, and innovative energy and water conservation and management.

The PPS can reflect this by:

- Requiring compact urban form that supports pedestrians, cycling, and transit for daily activities
- Focusing on building more sustainable communities that link land use planning with innovative energy generation and supply
- Providing more focus on urban ecosystem protection and enhancement and urban greening
- Ensuring that “food deserts” are not created by ensuring comprehensive community planning
- Require linkages between residential and employment growth
- Requiring a diverse and compatible mix of land uses including residential and employment to support socially inclusive, environmentally sustainable and economically vibrant communities
- Requiring coordination and sequencing of development with provision of infrastructure, transit and human services
- Requiring high standards for urban design taking into consideration such things as winter design, urban heat island effects, urban greening, innovative energy and water conservation and management

Agricultural and Rural Areas

Rural areas are important to the economic and social viability of both York Region and the Province.

In addition, access to a safe, secure food supply is a basic human right. The PPS must support agricultural activities across the province to ensure that food sources and agricultural production remain available locally and will work with local organizations to assist farmers in bringing locally grown and produced food and other agricultural products from farm to table.

The PPS should:

- Address near urban agriculture
- Permit broader range of supportive secondary uses
- Include policies to support local food production, markets, etc.
- Clarify provisions of the ORMCP with respect to alternative energy systems and renewable energy systems
- Within the Holland Marsh Specialty Crop Area, encourage and support the Province in balancing continued agricultural production and potential expansion with natural heritage values and policies
- Encourage the Province to proactively assess, encourage and promote policies and programs directed to the production, distribution and use of local food by residents and business
- Consider related and supportive farm uses (for e.g. agri-tourism, farm-gate sales, community gardens and other near urban agricultural practices) in areas outside of Provincial Planning areas, i.e. future urban area agriculture areas such as the whitebelt.

Servicing Our Population

While transportation planning is included in the existing PPS, we believe a stronger emphasis is needed on its critical role in shaping sustainable communities and enhancing the quality of life for the citizens of Ontario.

In order for sustainable development to succeed, transportation needs to be considered at the onset of the planning process. Transportation corridors are part of the public realm that serve to create a unique sense of place and community. Designing in and around these corridors at the pedestrian scale is therefore fundamental to supporting not only investments in infrastructure such as transit, but also the quality of life in the surrounding community.

The Province has already made significant gains in addressing the tension between land use planning and transportation planning through the *Growth Plan for the Greater Golden Horseshoe* (Growth Plan) and the Metrolinx Regional Transportation Plan (RTP): *The Big Move*. While the RTP provides the basis for which the Province can achieve the Growth Plan's objectives, it is the responsibility of the PPS to ensure that the priority objectives of the Growth Plan, the RTP and the Greenbelt Plan are fully integrated in a manner that provides clear interpretation and consistent implementation.

As we understand it, the Ministry of Transportation is developing a Transportation Provincial Policy Statement separate from the PPS. This separation will lengthen the process of effective integration between transportation and land use planning. We are concerned that strategically significant areas such as mobility hubs would not reach their full potential without a concurrent and coordinated planning process.

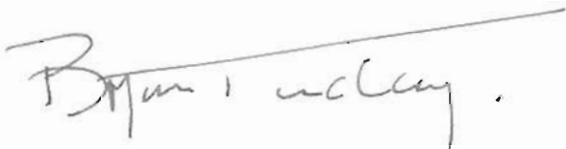
The PPS should:

- Ensure concurrent land use and transportation planning
- Emphasize reducing demand for services
- Encourage development that allows people to walk to meet their daily needs, produce less greenhouse gas emissions and promote a smaller carbon footprint, and improves better air quality and quality of life
- Provide tools to support the development and promotion of active transportation as part of a healthy, active lifestyle
- Provide tools to support transit and to ensure that rapid transit is provided to service the pace of development
- Encourage developers to ensure that accessibility is improved for seniors, children and individuals with special needs and providing the necessary amenities for these groups to access alternative modes such as transit, walking and cycling
- Ensure that the spatial distribution of land uses and the design of development support transit, walking and cycling
- Support Provincially identified Mobility Hubs as key destinations for all transportation modes and major locations for high density development including residential, employment, ICI and recreational uses, and further define Provincial interest and activities to support these
- Provide direction for better alignment of transportation initiatives at a Provincial, regional and local level.

- Support and implement multi-modal systems that provide seamless transportation mode integration
- Provide tools to protect key transportation corridors and tools to assess local airsheds to inform land use and transportation planning processes (As identified in the Environmental Commissioner of Ontario's Annual Report released Sept 22, 2010)
- Recognize the importance of parking management to increase transit and active transportation mode share
- Require Transit Demand Management as a development application requirement to ensure that all new development and redevelopment, including residential, ICI, retail and educational uses are pedestrian, bicycle and transit oriented, accessible and affordable
- Reflect the Province's work on moving towards zero waste reduction and require multi-residential three stream waste management and ICI waste reduction
- Promote demand management and alternative energy systems and renewable energy systems such as solar, wind, water, biomass, geothermal energy, energy-from-waste, local generation and district energy facilities.

Thank you again for this opportunity to comment on the PPS review. We trust that you will be sharing comments on this review with relevant Provincial Ministries and Agencies. We would be pleased to meet with your staff to discuss these recommendations in more detail.

Sincerely,



Bryan W. Tuckey, M.C.I.P., R.P.P.
Commissioner of Planning and Development Services

BT/la-p

c.c.

- York Region Depts.: Transportation Services, Community and Health Services, Environmental Services, Legal, Corporate Energy
- York Region Local Municipalities
- Regional Planning Commissioners of Ontario

Table 1 – York Region Detailed Comments

SECTION	EXISTING PPS POLICY	YORK REGION COMMENTS
PART I: PREAMBLE		
General		The PPS should be updated to reflect legislative changes impacting land use since 2005: Growth Plan, Greenbelt Plan, Clean Water Act, Lake Simcoe Protection Act and Green Energy Act were the most obvious.
	Public health and safety identified as a key policy are in current PPS.	Protection of human health and promotion of optimal health should be recognized as the cornerstone of Ontario's land use planning system.
		Health oriented development creates healthy, sustainable communities by recognizing the value of the natural environment and opportunities for exercise and recreation; access to healthy foods social equity and cohesion; safety and sec
PART III: HOW TO READ THE PROVINCIAL POLICY STATEMENT		
	"there is no implied priority in the order in which the policies appear"	The PPS does not reflect the hierarchy or respective priorities of Provincial interests or issue resolution between competing demands.
		The Province should consider taking a sustainability 'triple bottom line' approach as an overarching theme throughout the policies.
PART IV: Vision for Ontario's Land Use Planning System		
	Strong communities, clean and healthy environment and a strong community	Description of community needs to include references to "healthy, vibrant and sustainable".
		Recognize the multiple benefits of smart planning decisions. For example, land use planning policies that emphasize alternative forms of transportation have the co-benefits of improving air quality, increasing physical activity, reducing traffic-related injuries, improving social cohesion, reducing traffic congestion (moving people and goods) and improving the local economy.
		Should also focus on self-sustaining communities where people can meet their daily needs within close proximity to live/work/school, etc. (including food and energy production and waste management).
		Add: "healthy" 'vibrant' and 'sustainable' to the strong community.
		Add: reference to the determinants health and how the built environment influences population health.

		Add: reference to emerging trends like zero-waste, energy and water conservation (a reference to the Ontario Waste Diversion Act could be made here). Part of this planning, must include consideration of climate change impacts and community vulnerabilities to climate change. Climate change mitigation and adaptation warrants its own policy area in the PPS (or recognized as a guiding principle of this document). Ensure that land use planning and transportation planning are conducted concurrently to ensure that the appropriate growth management strategies are implemented in order that the existing and future transportation infrastructure can address land use impact.
PART V: 1.0. BUILDING STRONG COMMUNITIES		
Title	Building Strong Communities	Should be reframed as "Building Healthy Communities."
General	None	New subsections to be considered include policies relating to health and the built environment including: Sustainable Transportation; Walkable Communities, Age Friendly and Accessible Communities (with respect to traffic calming, cluttered sidewalks, access to public bathrooms, benches, sidewalk design, crosswalks, physical and income access included, etc), Complete Communities, Building Design; Land Use Designation; Infrastructure and Open Space. After "facilitate economic growth" ADD: but also promote optimal health and offers the needs of our most vulnerable populations (e.g. children, the elderly, low socio-economic status).
General		The PPS in general needs to consider access to healthy food at a neighbourhood level and limitations of unhealthy alternatives for vulnerable populations (e.g.). Add policies related to Nutrition/ Food Access (e.g. Community Gardens, Healthy Foods, Farmer's Markets, Local Food Charters, neighbourhood fresh food markets, community gardens etc). Explore ways to limit density of fast food outlets near schools, low income neighbourhoods. Current planning and business licensing tools do not allow municipalities to address this. The PPS in general needs to consider access and promotion of alcohol for vulnerable populations (e.g. limit density of alcohol outlets and businesses near schools, low income
General		

General		neighbourhoods, reduce placement of alcohol billboards near schools, etc).
		Recommend adding a section to address education areas, particularly with respect to the placement of educational institutions in a community. Local, accessible and multi-functional educational facilities can increase vitality of communities and address the determinants of health. It is also important that these facilities are not situated in areas that rely on car dependency.
1.1 MANAGING AND DIRECTING LAND USE TO ACHIEVE EFFICIENT DEVELOPMENT AND LAND USE PATTERNS		
General		Need a reference to the importance of accessibility of buildings, services, transportation systems and communities for all residents (OADA).
1.1.1	Healthy, liveable and safe communities are sustained by...	Include: ○ Promoting optimal health and addressing the determinants of health ○ Ensuring that health-protective separation distances are implemented to protect sensitive populations from sources of air pollution e.g. industrial sources and high traffic corridors. ○ Policy related to affordability of transportation and protection of vulnerable populations. ○ Add a policy about ensuring that transportation is affordable and accessible in urban areas by providing facilities that promote active lifestyles and protect vulnerable people, and ensuring that pedestrian and transit users are regarded first with respect to land-use development. ○ Encourage developers to support a range of transportation choices by ensuring that accessibility is improved for seniors, children and individuals with special needs and providing the necessary amenities for these groups to access alternative modes such as transit, walking and cycling. ○ As the Province has been working extensively in relation to water conservation and efficiency, it may be beneficial to include some development-related direction on efficiency standards etc. in the PPS. ○ Policies related to impact between the built environment and public health. ○ Add a policy promoting optimal health and addressing the determinants of health. ○ Add a policy to ensure that provincial setbacks and separation distances are implemented to protect sensitive populations (and associated land uses) away from sources of air pollution (e.g. Industrial and transportation sources).

1.1.1 b)	accommodating an appropriate range and mix of residential, employment (including industrial, commercial and institutional uses), recreational and open space uses to meet long-term needs;	Include a policy here as well on providing long-term financial sustainability of infrastructure, public services facilities and water & wastewater.
1.1.1 e)	Promoting cost-effective development standards	Need to recognize the shortcomings associated with the current funding models for community services and facilities and infrastructure, especially schools and higher order transit. Specifically, the current funding models restrict innovation in the design of schools especially in urban environs (suburban model favoured) and in the implementation of green technologies. Different Infrastructure funding models are needed to accommodate provincial intensification targets.
1.1.1 f)	Improving accessibility for persons with disabilities and the elderly by ...	Recommend removing: improving accessibility for persons with disabilities. Add: providing universal accessibility – since universal accessibility aims to remove barriers for all people and is not limited to persons with disabilities.
General		Policy related to affordability of transportation and protection of vulnerable populations. Add a policy about ensuring that transportation is affordable and accessible in urban areas by providing facilities that promote active lifestyles and protect vulnerable people, and ensuring that pedestrian and transit users are regarded first with respect to land-use development. Consider a Fare Subsidy for Low Income groups in order to provide access to community services/employment. Encourage developers to support a range of transportation choices by ensuring that accessibility is improved for seniors, children and individuals with special needs and providing the necessary amenities for these groups to access alternative modes such as transit, walking and cycling.
General		Policies related to impact between the built environment and public health.

		Add a policy promoting optimal health and addressing the determinants of health. Add a policy to ensure that provincial setbacks and separation distances are implemented to protect sensitive populations (and associated land uses) away from sources of air pollution (e.g. Industrial and transportation sources). Need to recognize that a longer planning horizon is required when planning for the protection of strategic employment lands. Need to recognize that a longer planning horizon may also be required when planning for other development issued including energy planning, infrastructure planning and sustainability. We support intensification and redevelopment, including brownfield redevelopment, as it utilizes existing infrastructure, reduces urban sprawl and provides an opportunity to rehabilitate historic contamination. Recommend a return to the 30 year time horizon, found in earlier versions of the PPS, which would be more appropriate where supported by forecasting models. Allow some flexibility in the planning horizon based on the issues being considered.
1.1.2	Sufficient land shall be made available for intensification and redevelopment....for a time horizon of up to 20 years	
1.1.3 SETTLEMENT AREAS		
1.1.3.2.a.3	"densities and a mix of land use which minimize negative impact to air, etc"	Water quality should be addressed in this policy. Further, policy should support a standard process to identify these negative impacts such as through health, environmental and cumulative impact studies. Promotes development that results in a smaller carbon footprint and generates lower greenhouse gas emissions resulting in reduces air pollution and higher quality of life. Climate Change impacts and vulnerabilities should be included in the assessment of the availability of planned infrastructure and public service facilities when identifying opportunities for intensification and projected needs.
1.1.3.3	"availability of planned infrastructure and public service facilities required to accommodate projected need"	

General		Need to address the long term sustainability of infrastructure especially within settlement areas. Recommend adding: Settlement areas need to be developed in such a way that provides/promotes the sustainability of infrastructure such as transit, by ensuring a variety of housing stock and promoting transit-oriented development.
1.2 COORDINATION		
General		Clear Provincial responsibility and accountability is needed around the necessity for consultation and coordination with the First Nations, Inuit, and Métis Nations as another level of government and /or organization. Best practices/training in this area would be beneficial. This section deals with managing water, but given the degree of cooperation that is going to be required for implementing CWA policies, particularly between the upper and lower tier municipalities; source water protection should be specifically mentioned, and potentially in section 2.2. as well. Coordination could specifically mention source water protection. Guidance from the Province would be appropriate in this section. Recommend adding: that follows a Context Sensitive Solution approach.
Section 1.2 (and 2.2)		Recommend adding: A coordinated, integrated and comprehensive approach <i>that provides a context sensitive solution</i> should be used when... A critical piece of applying a context sensitive solution to the transportation and land use planning is ensuring that there is a transparent and full engagement of the public. Recommend adding: full communication and public engagement as part of embracing a Context Sensitive Solution approach. Recommend adding: identifying climate change impacts and adaption as an area where cross jurisdiction collaboration is needed. Other agencies such as public health, social services, conservation authorities, etc. must be part of a comprehensive approach to growth.
1.2.1	A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, or which cross lower, single and/or upper-tier municipal boundaries, including:	Recommend adding: Integration of transportation and land use planning. Transportation and land use
1.2.1 c)	infrastructure, public service facilities and waste management	

	systems;	planning should be conducted concurrently to accommodate the impact of land use on infrastructure and public service facilities Infrastructure should be expanded to include: transportation and infrastructure planning.
1.3 EMPLOYMENT ÁREAS		
General	Employment and residential land	A commitment in the PPS to the development of a Provincially directed employment and residential land needs forecast methodology. Recommend that the Province develop a comprehensive strategy for the location of employment lands adjacent to the 400 series highways Ensure the long-term sustainability of employment lands by protecting them from conversion to residential and non-employment uses. Municipal concerns relating to employment lands can be alleviated if the PPS further distinguished between the various employment types, e.g. manufacturing, office, retail, institutional. The PPS at a minimum should mirror Places to Grow policies and definitions for employment land conversions and what constitutes an employment use. The term "employment" appears to be too general and conveys an intent that any use that provides a job can be permitted within these areas.
General	Economic Development requires a mix and range of employment	Feel the focus should be on the green economy and green jobs. The Green Energy Act, Water Opportunities Act and the Toxics Reduction Act provide opportunities for the Province to promote technologies and employment that are sustainable and competitive. Recommend adding a section to address education areas, particularly with respect to the placement of educational institutions in a community. Local, accessible and multi-functional educational facilities can increase vitality of communities and address the determinants of health. It is also important that these facilities are not situated in areas that rely on car dependency.
General	Employment and Transit	In major growth centres, employment shall be supported by a rapid transit system. employment areas should be located within reasonable transit distance from local residential. Focus on the promotion of green economy and jobs. Recommend: e) ensuring that employment areas are accessible by public transit, active transportation

		and other forms of affordable transportation systems.
1.3.2	Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review,	Need to consider the financial impact to public transit and affordable transportation in evaluating the reduction of employment land supply. Recommend adding: This comprehensive review shall consider the long-term financial impact to public transit and affordable transportation on reduction of employment land supply.
1.3.2	"over the long term"	"Over the long term" is not defined and suggest a period of time longer than the planned period. Need clarification around the definition of "over the long term" would be beneficial to assist municipalities in scoping the comprehensive review and evaluating the appropriateness of these conversions.
1.3.2	"non-employment uses"	The PPS does not provide a definition of "non-employment uses". The growth plan's employment area conversion policy classifies major retail and a non-employment use but does not define major retail. Recommend adding a definition within the PPS on whether major retail used are a non-employment use. Further definitions need to be provided in terms of what constitutes a major retail use, an employment area, employment uses and non-employment uses.
1.4 HOUSING		
General	Affordable housing	Province needs to provide more guidance and leadership towards implementing and achieving the affordable housing targets established in the PPS. A commitment in the PPS to the development of a Provincially directed program to provide affordable housing in Ontario. The PPS makes no mention of "innovative" approaches for affordable housing development, be it through section 28 (community improvement plans), 37 (increased density for community benefits), or 45(9) (condition of approval for variance). Most municipalities are hesitant of using these tools; some are not even aware of them. A policy encouraging the use of these tools would go a long way to raising awareness. A policy requiring zoning by-laws to permit section 37 usage would be really innovative. The appropriate range of housing types and densities focus should be expanded to include tenures (i.e. rental, ownership) and services (i.e. emergency shelters, transitional housing, special needs housing) as well. This could be expanded upon perhaps by establishing and implementing minimum targets for shelter, special needs, and rental housing development.
1.4.1	To provide for an appropriate range of housing types and densities ...	

1.4.1.	"support alternative transportation modes"	New housing should not only "support the use of alternative transportation modes and public transportation but is should make alternative and active transportation the easiest and most accessible form. Ensure that the spatial distribution of land uses and the design of development support transit, walking and cycling. Ensure that pedestrian and bicycle facilities become integral in all development including but not limited to residential, commercial, industrial, employment and institutional. Recognize the importance of parking management to increase transit and active transportation mode share. Add: ensuring that the form of housing is developed on a permeable transportation grid and that housing supports transit-oriented development. Building the highest level of energy efficiency into new housing developments provides a cleaner and lower cost opportunity to meet energy needs. If municipalities are to promote "densities for new housing which efficiently use land, resources, infrastructure, and public service facilities", then they also need a policy requiring that such resources, infrastructure, and public service facilities be correspondingly developed at a density that is compatible with the new housing densities. Energy Efficiency and conservation in new housing should be required. See also comments on s. 1.4.1 Also important that "affordable to low and moderate income households" should be accessible to daily amenities, recreation, education, employment etc. and within a walkable/bikeable distance or with access to public transit. Agree that all housing should meet the social, health, and well being requirements. Would add that injury prevention and age friendly design must also be considered.
1.4.1	Housing and transit oriented development	
1.4.3	"need to provide a range of housing types"	
1.4.3.a	"affordable to low and moderate income households"	
1.4.3.b.1	"to meet the social, health and well-being"	
1.5 PUBLIC SPACES, PARKS AND OPEN SPACE		
General	None	This section should reference the need to create integrated and interconnected park, trail and natural systems.
General	None	There is a need to recognize the importance of our urban forest resources (which may not

		always be defined as a natural feature). Urban forests should be afforded protection as an important ecological component of our urban natural heritage system. Need greater clarity around the definition of significant forests The PPS should provide policy support and tools to local municipalities to protect local forest resources which may be culturally or locally significant. Active Transportation should be encouraged and included in the design and implementation of all public spaces, parks and open spaces. Recommend adding: Active Transportation shall be promoted in all public spaces, parks and open spaces where impact to the Natural Heritage system is minimal. Need to ensure walkable distances from neighbourhood to these and other recreational facilities.
1.5.1	Healthy, active communities should be promoted by:	The type of facilities that are designed for pedestrians must be context sensitive and designed at the appropriate scale. This will require that sidewalks may vary depending on the size and scales of the roadway.
1.5.1 a)	Planning public streets, spaces and facilities to be safe, meet the needs of pedestrians ...	
1.6 INFRASTRUCTURE AND PUBLIC SERVICE FACILITIES		
General		Green infrastructure and renewable energy sources should be the number one priority when planning new infrastructure. Infrastructure should also be appropriately designed to address the impacts of climate change and appropriately sized to ensure adequate yet efficient use. As the Province has been working extensively in relation to water conservation and efficiency, it may be beneficial to include some development-related direction on efficiency standards etc. in the PPS. Recommend adding: facilities that are context sensitive and respond appropriately to the environment, natural heritage system and cultural heritage. Also need to ensure access for persons of all ages and abilities be included in the consideration of planning within the public realm.
1.6.1	"provided in a coordinated,	Municipalities face great uncertainty in securing approval under the Environmental

	efficient and cost-effective manner"	Assessment process, especially those projects requiring Individual Environmental Assessments. This can undermine the Master Planning and Growth Management exercises that many municipalities rely on to achieve provincial growth objectives. Need assistance from the Province in order to achieve integration between planning for growth and infrastructure requirements in order to ensure that facilities are available to meet current and projected needs. Strong support for the development of rapid transit systems that correlates with the pace of development Ensure that new roads or reconstructions do not undermine the viability of existing or planned rapid transit systems. Ensure that development provided that development provides accessible and affordable access to transportation and that it is achieved in a strategic and systematic manner. Ensure that high density development is designed to be transit oriented and is coordinated with transit planning
1.6.4	Sewage and Water	The focus should also include the sustainability of infrastructure over the long term. An example of this is transit. Without sustained operating funding maintaining transit service in new developments is difficult since the cost recovery is low. Recommend adding: the long term sustainability and maintenance of infrastructure shall be evaluated in order to determine appropriate phasing and location of infrastructure and public service facilities. Recognize and promote that the success of transit systems is the combination of capital investment, sustained operating funding and transit oriented landuses/development.
1.6.4.1.b	Ensure these systems are provided in a manner that....	Coordination of the PPS and Water Opportunities Act would be beneficial on a number of fronts specifically relating to: • Municipal water conservation plans • Risk assessment and management plans • Protection of ecological resources • Consideration of risks posed by climate change

1.6.4.1 e)	Policy 1.6.4.1 (e), two terms, “ reserve sewage system capacity ” and “ reserve water system capacity ” are used with definitions being given.	The Ministry of Environment’s Policy D-5-1 entitled “<i>Calculating And Reporting Uncommitted Reserve Capacity At Sewage And Water Treatment Plants</i>”, allocating water reserve capacity is based on maximum daily demand, while allocating sewage reserve capacity is based on average daily flow. This MOE policy also provides for water quality needs to be considered when allocating the wastewater reserve capacity. However, the definitions on the PPS do not stipulate the same. In MOE’s policy, two terms, “uncommitted water reserve capacity” and “uncommitted wastewater reserve capacity”, are equivalent to the terms, “reserve sewage system capacity” and “reserve water system capacity”, which are used in the PPS. MOE’s definitions provide detailed calculations and rationale. However, hauled sewage is not covered by the MOE policy. To be consistent, it is suggested that these two terms in the PPS be revised to “uncommitted water reserve capacity” and “uncommitted wastewater reserve capacity” and to adopt MOE’s definitions on these two terms plus the provision associated with hauled sewage.
1.6.5	Transportation Systems	The Regional Transportation Plan identifies the importance of Mobility Hubs that provide multi-modal and inter-regional connections. The PPS should be updated to reflect this designation. Recognize that land use planning is directly linked to the viability of mobility hubs. Mobility hubs with at least four transportation modes should be recognized as having provincial interest. Further, the PPS should recognize the significance of mobility hubs in urban growth centres as key destination for all transportation modes and major locations for high density development including employment, institutional and recreational uses While pedestrians are recognized in the PPS, stronger language should be given to assign priority to this mode of transportation. Recommend the PPS establish a “passenger transportation hierarchy” as identified in the Metrolinx Transportation Plan “as the basis for planning, designing, financing and operating of the transportation system”. This model, where trip reduction/avoidance, active transportation and transit, are highest on the hierarchy, and the single occupancy vehicle is lowest would benefit public health as it would reduce emissions by having fewer vehicles on the road, and increase physical activity.

		Attention should be given to ensure that transportation infrastructure strives to protect and enhance both the natural and cultural environment. Transportation Demand Management will play an increasing central role in mitigating travel demand and therefore should be identified in this section. Support opportunities to connect urban growth centres through transit and rapid transit technologies in order to reduce single-occupant vehicle use. Recommend adding: Priority should be given to provincial, regional, urban growth areas and mobility hubs in the planning and development of new infrastructure. The transportation system should place pedestrians, transit and alternative transportation modes at the top of the transportation mode hierarchy. Transportation systems should protect and enhance the cultural and natural environment. All new development should implement and support Transportation Demand Management initiatives. The definition of infrastructure includes "transit and transportation corridors and facilities", however within the policies, transportation, infrastructure, and specific infrastructure elements such as transit or transportation rights-of-ways are considered as distinct systems. Clarification should be given within the existing Transportation Systems (1.6.5) and Transportation and Infrastructure Corridors (1.6.6) policies. Policy needs to be strengthened to include education and promotion of alternative modes of transportation. Recommend "Efficient use shall be made of existing and planned infrastructure including promotion of and education for alternative and active modes of transportation."
1.6.5.2		
1.6.5.4	Calls for land use pattern, density and mix of uses that "minimize the length and number of vehicle	Strongly support section 1.6.5.4 Other modes should also be included within this statement including pedestrian and bicycle

	trips and support the development of viable choices and plans for public transit and other alternative transportation modes, including commuter rail and bus"	travel. Support and implement multi-modal systems that provide seamless transportation mode integration. Require that the transportation impact of development is measured on the movement of people and goods rather than vehicles.
1.6.6	Transportation and Infrastructure Corridors	The reality of sustainability is that it requires dedicated funding source to maintain its reliability, affordability and maintain operations. Funding large transit infrastructure projects (e.g. Yonge Subway, overpasses, etc) needs support to match pace of development. Provincially identified Mobility Hubs need Provincial interest/support It is critical that planning authorities begin to ensure that long-term sustainability is demonstrated for all transit and infrastructure projects and as well, there is a need for improved alignment of land use and transportation plans at all levels - lower tier, Regional, Metrolinx, Province (MTO & MMAH). Support Transportation Master Plan initiatives - (e.g. Bradford By-Pass, Transit First Initiatives, etc) Recommend Adding: Planning authorities shall ensure the fiscal sustainability and equitable funding of transit and infrastructure facilities.
1.6.6.1	Planning authorities shall plan for and protect corridors and rights of way for...	The long term protection of transportation infrastructure corridors and right-of-way should not be restricted to the current 25 year planning horizon.
1.6.7.1	Sensitive Land uses	Clarification should be provided regarding the horizon of "projected needs." More specificity required around this policy Recognizes the importance of separating sensitive land uses from airport, etc. This policy should also recognize the importance of separation sensitive lands uses from air pollutants and other hazardous substances as currently defined in the PPS.
1.6.8	Waste Management	Waste management policies should provide statements on the need for extended producer responsibility and the need for national/provincial standards on packaging materials.
1.6.8	"appropriate size and type to	Planning decisions should prioritize waste reduction over waste disposal and consider the

	accommodate present and future requirements"	most energy efficient methods. Communities should be encouraged to find local solutions to waste diversion and to promote the use of materials that are the least toxic and most renewable. The Waste Diversion Act should be referenced here.
1.7 LONG-TERM ECONOMIC PROSPERITY		
General		PPS should recognize that a sustainable funding model for all public infrastructure is part of achieving long term economic prosperity.
1.7.1 e)	Planning so that major facilities (such as airports, transportation /transit/rail infrastructure and corridors...and sensitive land uses are appropriately designed, buffered and/or separated from each other to prevent adverse effects from odour noise and other contaminants, and minimize risk to public health and safety	More clarity should be given to this statement to ensure that the nature of future growth centres and mobility hubs which provide inter-modal transportation connections and support residential and institutional uses are encouraged and supported. PPS should recognize that this policy statement is important not only for long-term economic prosperity but also to maintain and improve public health.
1.7.1 f)	Providing opportunities for sustainable tourism development	The development of green technologies in the construction and implementation of infrastructure should be encouraged and prioritized. Long term prosperity should also be supported by providing opportunities to promote a green economy through education facilities and businesses that focus on sustainable and renewable technologies. Recommend adding: Provide opportunities to integrate green technologies in the development of infrastructure and in particular for road construction/reconstruction to mitigate stormwater on the environment.
1.7.1.g	Promoting the sustainability of the agri-food sector by protecting agricultural resources and minimizing land use conflicts	A broader statement regarding local food security and access to healthy food is required. This allows municipalities to support urban agriculture projects, which will be on a smaller scale than most agri-industrial operations. Recommendation: Promoting local food security and access to healthy food, including the sustainability of the agri-food sector by protecting agricultural resources and minimizing land use conflicts; and

1.8 ENERGY AND AIR QUALITY	
General	Municipalities should be encouraged to prepare community energy plans and to encourage renewable and alternative energy sources as a means to create resilient and self sufficient sources of energy. If the Province intends on keeping the regulations of alternative energy systems at the Provincial level, such requirements should consider permissions around these systems in relation to public health and safety, particularly within urban environments with compact neighbourhood designs where the current regulations does not consider how a poorly installed system can potentially damage adjacent property or pose a health and safety risk to nearby people. While the governance of buildings and structures is traditionally within the realm of municipalities through Section 34 (Zoning) of the Planning Act, the current exemptions within the Planning Act do not permit a municipality to regulate alternative energy systems and renewable energy systems. The PPS should contain a policy that provides directions for Provincial regulations of such systems. The PPS should recognize the importance of air quality on public health and provide direction on locating sensitive land uses away from major sources of air pollution and/or how to mitigate against the effects of air pollution when alternative locations are not feasible.
General	Included in the actions to support energy efficiency and improve air quality should be provisions of adequate separation distances between sensitive land uses such as residences and daycares, to sources of emissions such as high traffic corridors and industrial facilities. Acceptable separation distances should be identified from best practices and current scientific studies that have demonstrated the health impacts associated with various air contaminants. Background air quality and cumulative impacts should also be considered in land use planning decisions that involve sensitive land uses. While the Ministry of Environment does establish guidelines for separation distances from specific sources of pollutants, they do not cover all sources such as high traffic corridors. Jurisdictions should also be given the opportunity to adopt more restrictive separation distances.
General	Transportation Demand Management (TDM) is a practice that supports the reduction of Greenhouse Gas Emissions and improves air quality. Recommend adding: Promote and require a TDM plan as a part of the development review process for all new development applications.

General		There has been a lack of direction from the Province in how to treat geothermal heat pump systems. There is the promotion of such systems from Ministry of Energy and Infrastructure from the renewable energy perspective while Ministry of the Environment has acknowledged some of the potential threats to drinking water sources from the installation of these systems. Our adopted OP notes its policy is to look to the province and the federal government for standards on these systems and their relationship to source water protection. As you know, we had made the pitch to MOE to have such systems included as a threat under CWA regulations, but this was not picked up in the amendments. PPS should provide direction on the treatment of geothermal heat pump systems. Include district energy as well, given that it requires use of shared infrastructure. Alignment with the Green Energy Act is required. It is important to make the link between these land use planning decisions and health impacts associated with exposure to air pollutants. Small scale energy generation should also be included in the planning of energy generation facilities to accommodate current and projected needs (section 1.8.2).
1.8.1 a to e	Planning authorities shall support energy efficiency and improved air quality through land use development patterns which....	
1.8.2	Increased energy supply should be promoted....	
2.0 WISE USE AND MANAGEMENT OF RESOURCES		
General		This section should also address Climate Change Adaptation and Mitigation. The PPS should contain direction on Province's goals related to the reduction and sequestration of greenhouse gases.
2.1 NATURAL HERITAGE		
General	Natural features and areas shall be protected for the long term....	Natural Heritage should be afforded stronger protection than "for the long term" for e.g. in perpetuity, especially where they are identified as provincially significant. The PPS should use terminology consistent with provincial plans.
2.1, 2.2, 2.6 and 3.1	terminology	The use of "development and site alteration" in sections 2.1, 2.2, 2.6, and 3.1 of the PPS should instead reflect the terminology used in the ORM, LSPP and Greenbelt plans of "development or site alteration".
2.1.2-3	Diversity and connectivity of natural features, Development	There is no clear statement to design and protect natural heritage systems (NHS). Rather, it currently appears as a component of PPS 2.2, which has a focus on natural features.

	and site alteration	The Natural Heritage Reference Manual (2nd Edition) includes a discussion of ecosystem services relating to NHS design. Recommendations: 2.1.2 Natural heritage systems shall be designed and protected for long-term persistence of identified biodiversity, maintenance of ecological function and provision of ecosystem services. 2.1.3 The diversity and connectivity of natural features, corridors and restoration areas comprising <i>natural heritage systems</i>, should be maintained, restored or, where possible, improved, recognizing linkages between and among <i>natural heritage features and areas</i>, <i>surface water features</i> and <i>ground water features</i>.
2.2 WATER RESOURCES		
General		Municipalities should be required to not only identify but also protect those features that are necessary to maintain the hydrologic function of a watershed. The PPS refers to sensitive groundwater in the context of protecting this as an environmental resource, whereas the Clean Water Act refers to significant groundwater in the context of protecting groundwater as a drinking water resource. This section deals with managing water, but given the degree of cooperation that is going to be required for implementing CWA policies, particularly between the upper and lower tier municipalities; source water protection should be specifically mentioned, and potentially in section 2.2. as well. Coordination could specifically mention source water protection. Guidance from the Province would be appropriate in this section. (same comment as section 1.2)
2.2.1	Planning authorities shall protect, improve or restore the <i>quality and quantity of water</i>	The review of new development and re-development applications under the <i>Planning Act</i> provides only a piece-meal approach to assess any potential quality and quantity impacts to drinking water sources. Amendments to the <i>Planning Act</i> are needed to assist in assessing cumulative impacts early in the development approval process on a community-wide or secondary plan basis. The Province needs to define "provincial interest" as it relates to source water protection. This should be reflected in the PPS and in key planning legislation and any associated, plans or policies (e.g. Places to Grow, the Building Code).

2.3 AGRICULTURE		
2.3.1	"Prime Agricultural areas shall be protected for long-term use"	Need clarity around the phrase "long term use."
General		A definition around the meaning of long-term use would improve the clarity of the PPS. Prime Agricultural Land and Specialty Crop Areas, especially with the GTAH faces tremendous pressures and should be vigorously protected. Renewable and Alternative Energy Systems should only be permitted in these areas where it can be demonstrated that there is no long term impact to the agricultural use of these lands. Near Urban agriculture also needs to be addressed in a more comprehensive and in a different manner than traditional agriculture. The Province should consider permitting a broader range of secondary uses in near urban agricultural areas especially where such uses add value rather than erode the agricultural industry. Province should encourage and promote policies and programs directed to the production, distribution and use of local food by residents and business.
General		
General		
2.4 MINERALS AND PETROLEUM		
		Need to ensure mineral extraction in prime agricultural areas is managed, phased and scaled in such a manner that maintains the municipality's ability to also protect the overall economic health of the agricultural industry.
2.5 MINERAL AGGREGATE RESOURCES		
		There needs to be more protection afforded to Natural Heritage Systems, vulnerable surface water areas and ground water recharge area, agricultural lands and Specialty Crop Areas that also contain mineral aggregate resources.
		Extraction in these areas should be done in a progressive manner that minimizes soil erosion and the increase of atmospheric sources of phosphorous
		Rehabilitation standards should be elevated in these areas to ensure no net loss of agricultural, hydrological and ecological function.
3.0 PROTECTING PUBLIC HEALTH AND SAFETY		
Section 3	"Protecting Public Health and Safety"	It is important to recognize that" Ontario's long-term prosperity, environmental health and social well-being" is dependant not only on "reducing the potential for public cost or risk to Ontario's residents from natural or human-made hazards" but on increasing the benefits to residents as a result of the way the community is planned. There is a significant opportunity

		for land use planners to work with local public health agencies to promote the health of the population as a whole, and improve the health of our most vulnerable populations, through land use planning and development.
3.1 NATURAL HAZARDS		
General		This section should also acknowledge other public health risks associated with development in flood prone areas e.g. water quality, mould, and infectious diseases.
		Section 3 should be expanded to include Promotion of Public Health and Safety.
3.2 HUMAN-MADE HAZARDS		
General		Human-made Hazards, development should not proceed until rehabilitation measures to mitigate the known or suspected hazard have been completed. Reference should be made to brownfields legislation under the Environmental Protection Act when addressing remediation of contaminated sites.
4.0 IMPLEMENTATION AND INTERPRETATION		
4.0	"Province, in consultation with municipalities, other public bodies and stakeholders shall identify performance indicators for measuring the effectiveness of some or all of the policies."	It is important to monitor the implementation of policies within the PPS to demonstrate success that communities are making with respect to building healthy and prosperous communities. The Province should provide some indication if the review of the PPS, 2005 will include a review of the performance indicators that were approved earlier this year. Provide municipalities with tools (e.g. guidance and technical documents) to assess and measure Impacts of the built environment on health and the environment.
6.0 DEFINITIONS		
3.1		Section 6 provides definitions for terms used in the PPS. Recommend adding definitions for: Determinants of Health; Complete Communities; Built Environment; Walkable Communities, Age Friendly Communities, Urban Health Island; Climate Change Mitigation and Adaptation; Vulnerable Populations; Active Transportation; Cumulative Health Impacts, Health Risk Assessment; and Positive Effect. Below are recommendations for existing definitions: • Adjacent Lands: include lands contiguous to hazardous and contaminated sites • Comprehensive Review: add: "identifies potential public health impacts and/or benefits."

		• Flooding Hazard: consider climate change impacts • Employment- expand definition so that employment lands can be protected from erosion by retail commercial and commercial warehousing/retail operations. There should also be consideration of further defining other office, retail and institutional uses so that these uses are not applied as "employment" justification within "employment lands". A recent OMB decision where a school is considered an "employment" use shows the extent of how vague the term can be misinterpreted as conforming to the PPS. • Conversion – the PPS should contain a definition that defines conversion • Hazardous Lands and Hazardous Sites: expand to include man-made hazards • Infrastructure: expand to include health care services such as hospitals and clinics. Also include • neighbourhood infrastructure such as street lighting • Minimum Distance Separation Formulae: expand to included incompatibility concerns relating to health related air quality issues from sources of air pollution including industrial sources and high traffic corridors. • Negative impacts: include human health hazard • Quality and quantity of water: include microorganisms (beyond just bacteria) • Sensitive land uses: include adverse effects generated by transportation corridors, airports, affordable house. • Updated and more relevant definitions for housing affordability and low- and moderate-income households. This would be especially important if the long-form census is made voluntary, thereby eliminating the reliable data source for the affordability calculations. The existing definition for "<i>natural heritage features and areas</i>" includes significant features which are important for their "...environmental and social values as a legacy." However the definition of "<i>significant</i>" does not have any criteria related to social values, which should be included as municipalities designate more of their natural heritage systems that also include a cultural or social value component. The effect of not having such criteria in the PPS is the formulation of opinion that such social values do not form part of a "<i>significant</i>" feature under the PPS and hence are not required to be considered for conformity to the PPS.
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ⁱ Ontario Public Health Standards 2008 (published by the Minister of Health and Long-term Care pursuant to Section 7 of the Health Protection and Promotion Act, R.S.O. 1990, c. H.7.)