

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS**Appendix I Response to Co-ordinated Review Discussion Questions****1. How can the plans better support the long-term protection of agricultural lands, water and natural areas?**

- Although the provincial plans address protection of lands for farming, there is need to support a working agricultural landscape. The Province has made improvements to the Provincial Policy Statement to clarify policy, criteria and definitions for agriculture-related and on-farm diversified uses. These same policies should be reflected throughout the three Greenbelt plans (GBP, ORMCP, NEP) to provide consistent, supportive policy guidance for agriculture, and not be modified or unnecessarily limit permissions as they currently are within each of the plans.
- Avoiding and mitigating agricultural and rural land use conflicts are an important part of proper growth management and are especially relevant in a growing region where there is potential for incompatible land uses and conflicts in close proximity to agricultural operations. Additional tools such as guidelines are needed to protect viable agricultural operations from encroachment. The Province should develop guidelines to assist municipalities in implementing the mitigation of new urban and rural non-farm uses where these may be incompatible with existing agricultural operations and advise when appropriate buffers, setbacks or other mitigation may be required.
- Implementation challenges also arise when multiple layers of policy are required to be implemented across a jurisdiction. This has been particularly relevant for the Region of Peel and Town of Caledon where all four plans have prescribed requirements, criteria and mapping of natural heritage systems and features, and where policies are inconsistent between plans. Natural heritage and water resource systems policies, designations, criteria and mapping should be harmonized with an appropriate standard of protection across all of the provincial Greenbelt plans. The Province should review the need to prescribe criteria for certain types of key natural heritage features (e.g. agricultural drains, headwater swales, etc.) which have not been viewed to be reasonable by the public or necessarily required in light of existing regulation outside of the Planning Act (e.g. Conservation Authorities regulations, Fisheries Act, Woodland Protection By-laws).
- When harmonizing natural heritage policies, care should be undertaken to ensure there is no over-regulation of small scale development or unnecessary requirements that trigger planning approvals for accessory uses, buildings and structures or for minor modifications to existing uses and non-conforming uses. Existing use policies were some of the more difficult policies to explain and address through municipal official plan conformity exercises. Policy harmonization for natural heritage should carefully balance and simplify implementation requirements for agriculture, since both agriculture and natural heritage can co-exist in a working landscape.

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS

- The province should comprehensively review provincial aggregates policies beyond the current policies within provincial land use plans and strengthen provisions encouraging comprehensive rehabilitation planning. Land use policy cannot apply retroactively to existing licensed operations, nor can existing policies compel future operations to substantively contribute to the rehabilitation of other sites. Strengthened policies within the provincial plans, as well as new Provincial regulation or incentives outside the Planning Act, such as dedicated use of increased aggregates levies, should be developed as a coordinated framework to more effectively achieve the plans' comprehensive rehabilitation objectives related to aggregates resources. Expansion or enhancement of the Management of Abandoned Aggregate Properties Program (MAAP) should be considered as a vehicle to deliver stronger aggregates rehabilitation policies where extraction activities have been concentrated.
- Greater oversight and control of fill disposal is also required. Dumping of fill (which could be contaminated) in rural areas puts groundwater and agricultural land at risk of contamination. More rural communities are recognizing this potential threat and would benefit from stronger provincial guidance and oversight.
- Development applications that pre-date the plans i.e., transitional applications, can currently proceed regardless of their incompatibility with current planning standards and their potential degradation and destruction of ecological and hydrological features and functions. Consideration should be given to having a 'sunset clause' for these applications.

2. How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, road, sewers and water?**Goods Movement**

- The Region thinks the Province should create a Long Range Transportation Plan for the GGH Area (GGHA) to support the overall goals of the Growth Plan. This plan would identify transportation challenges anticipated in the GGHA over the next 20-30 years, develop an integrated and multi-modal transportation strategy to address these issues, and prioritize investment opportunities.
- The review should consider adding policies promoting the establishment of Freight Villages to support goods movements at key locations within the GGHA. This work should be combined with the release of Freight Supportive Guidelines to help municipalities achieve Growth Plan goals.
- Consideration should be given to the development and implementation of freight TDM (transportation demand management) programs to consolidate goods movement, reduce truck trips and maximize capacity of truck trips.

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS

- The review should consider introducing stronger policies that will enable municipalities to identify and protect lands for strategic employment uses, especially around provincial corridors such as the GTA West Corridor.

People Movement

- There is no requirement for municipal “complete street” policies. Policy language remains discretionary, as the PPS, 2014 still only states that public streets “should be” planned to facilitate cycling and other forms of human-powered travel, rather than requiring them to be planned in such a manner.
- The review should include policies to mandate schools to develop walkable schools and school travel plans to get more students to walk and bike to/from school.
- The Province should work with GO Transit to develop and implement programs to have more GO passengers use sustainable modes (carpool, bike and walk) to get to stations.

3. How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?

- The Growth Plan should provide more specific guidance on how municipalities are to address affordable housing needs in their OPs.
- Complementary to the Growth Plan, the Province should consider strengthening municipal planning tools for affordable housing such as enabling inclusionary zoning.
- The Province should advocate to the federal government to encourage private sector investment in rental housing through:
 - changes in the tax system (accelerating capital cost allowance, reduction in capital gains tax, soft cost deductibility); and
 - tax incentives (e.g., Harmonized Sales Tax rebate on new construction, low income housing tax credit program).

4. How can the plans better support the development of communities that attract workers and the businesses that employ them?

- The review should examine the Growth Plan employment forecasts specifically the methodology, assumptions and distribution within the Greater Toronto and Hamilton (GTAH) area. In addition, the Growth Plan should allow for flexibility when implementing its population and employment forecasts at the municipal level. For example the plan should provide a numeric and timing range within which the forecasted growth will occur, depending on economic conditions.
- If exact forecasted targets need to be met, then municipalities should be allowed to set a time frame within which these targets should be achieved.

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS

- The review should also examine the practicability of the combined greenfield density target. Planning to achieve a combined greenfield density target of 50 jobs and residents per hectare has been challenging in some parts of the GTAH area. The greenfield combined employment and residential density target should be amended in a way that distinguishes which types of employment are included in the combined density targets, whereby industrial jobs would be excluded, and population-related jobs and knowledge based jobs would stay combined with the residential target. Alternatively, the review should at least explore the issue of measuring greenfield densities differently – possibly excluding some employment uses (e.g. warehousing and logistics) that require few employees.
- The province should define a class of ‘strategic employment lands’ that are essential for future employment development and that are dependent on infrastructure for goods movement, including industrial / manufacturing / logistics, by articulating criteria in the Growth Plan that would aid in identifying these strategic employment lands, including such areas as 400 series highways corridors, airport lands and strategic transit corridors. Given their importance to the regional economy, the provincial government should protect or allow for ‘generational’ protection of these strategic employment lands, either with no time horizon, or a minimum 30 year protection and planning horizon. This issue is particularly important in the light of planning for a major transportation corridor (GTA West) that may define Peel’s urban structure.
- The residential intensification rate should be increased beyond 40% minimum rate for the GTAH area to encourage complete communities and protection of environmentally sensitive areas such as the Greenbelt, Oak Ridges Moraine and the Niagara Escarpment.
- In order to intensify the corridors within employment areas, the review should consider introducing more flexible land use policies. The Growth Plan in particular should provide more specific policies that encourage or require achieving higher densities along urban corridors and around transit stations.
- The plans should make sure that new retail development is better integrated with residential development through appropriate location and functions. It cannot be just a shopping mall but should have a “sense of place” and contribute to the creation of complete communities.
- It is important that the provincial plans include policies that support economic development of rural communities taking advantage of local resources. Both, the agri-food and mineral aggregate resource sectors should be encouraged but better regulated to ensure that the natural environment is protected.

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS

5. How can the plans help address climate change?

- Continue to promote and facilitate the development of compact and complete communities that are properly serviced by transit. This will result in higher density, walkable, transit – supportive communities that will reduce greenhouse gas (GHG) emissions.
- Given the apparent increase in weather related emergencies, the Province should focus greater effort and resources to proactively plan more resilient communities in order to limit use of costly emergency response and recovery after events.
- The plans should continue other provincial leads such as the PPS with respect to providing policy direction or guidance on use of green infrastructure and other types of infrastructure that are resilient in light of climate change.
- The role of policy, including options to strengthen growth management direction in provincial and municipal plans, such as improved support for intensification, better staging, coordination and delivery of infrastructure to support growth in existing built up areas, and planning that supports mixed use, compact communities should be considered as these will help reduce the consumption of agricultural land and provide co-benefits related to emissions reduction in other sectors such as transportation.
- The enhancement and maintenance of natural heritage systems through the GBP, NEP and ORMCP and through municipal official plans contributes to potential carbon sequestration and the ability to absorb (GHG).

6. How can the implementation of the plans be improved?

- Add a section to the Growth Plan about public health that addresses the impacts of land use planning and development on health with particular reference to chronic disease.
- The Province should provide a methodology that municipalities can use to determine land budgets for consistency purposes.
- The review should consider introducing stronger policies that will enable municipalities to identify and protect lands for employment uses.
- The province should establish more specific implementation guidance for its plans. One of the areas that could benefit from this initiative is land budgeting. Differences in the methodology and assumptions used by municipalities to determine their land budgets has made it difficult to defend the municipal comprehensive review at the Ontario Municipal Board (OMB). The Provincial Government should provide a uniform methodology for determining land budgets.

10.6-15

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS

- There should be consistent definitions, designations, technical guidelines between the plans which should be an outcome of an harmonization process. The key policies requiring harmonization include agriculture, natural heritage and water resources but others are important also (rural uses, rural settlement policies, servicing, etc.).
- The province should provide greater support to municipalities and conservation authorities in the area of policy interpretation through 'best practices' manuals, technical workshops and dedicated and timely communication.
- Strengthen implementation through the expansion of targets and indicators to monitor the achievement of compact complete communities. This includes:
 - Developing a set of indicators to measure the implementation of the policies in the plan
 - Monitoring the implementation of the plan, including reviewing performance indicators
 - Developing guidelines that municipalities can use to monitor and report on the implementation of the Plan
- Need greater accountability in the implementation of the Plans
- Link incentives to monitoring which reward municipalities for exceeding the minimum requirements of the plan
- There is a need for accurate, up to date provincial mapping within the plans (GBP, NEP, and ORMCP) which delineates boundaries of features in order to protect them. The Province should therefore, set up a process for amending boundaries as considered necessary.
- The province should avoid policy duplication wherever possible such as leaving drinking source protection policy direction within protection plans under the Clean Water Act and not duplicating policies across provincial plans. In addition, currently municipalities play no role in the water taking permitting process and should be given more authority in that process.

The report, **Improving Health by Design in the Greater Toronto-Hamilton Area**, (for which Peel Public Health was a contributing author) stipulates how to strengthen **Places to Grow**. Recommendations included:

- Reconsider existing targets in order to increase the development of compact, complete communities. For example, it has been recommended that "government should gradually increase the Growth Plan's density and infill targets every 10 years." However, it has also been noted that there are challenges with how the existing targets are being interpreted and applied, as well as the extent of their achievement to date.

April 15, 2015

2015 CO-ORDINATED REVIEW OF PROVINCIAL PLANS

Having targets implies that there are quality indicators that can be measured in a consistent and reliable manner.

- Expand the use of indicators beyond simply measuring density to better monitor the achievement of compact, complete communities. This might include establishing indicators and targets for levels of active transportation and public transit use. As noted elsewhere, the current Plan has a number of existing provisions that support performance measurement that have not yet been implemented.
- Provide incentives to municipalities to meet and exceed minimum targets. As noted in a recent review of the Plan, “there are no incentives for municipalities to achieve the minimum targets and no stated penalties for those that do not, nor are there any incentives for municipalities to exceed the minimum requirements of the Plan (although they are ‘encouraged’ to do so).”
- Support municipalities in implementing Places to Grow by providing tools to assess:
 - The economic costs of development over the long term (e.g., infrastructure, utilities, service provision) using different scenarios of intensity.
 - The health impacts of land use and transportation planning.
- Support a public health perspective on the achievement of healthy, compact, complete communities by:
 - Incorporating greater consideration of health impacts in the upcoming review of Places to Grow
 - Actively supporting the involvement of public health units in land use and transportation planning in municipalities to support health-based analysis of plans.