



Grey
County

Planning and Development

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December 14th, 2022

Provincial Land Use Plans Branch
13th Floor, 777 Bay St.
Toronto, ON, M7A 2J3
Via email: growthplanning@ontario.ca

RE: County of Grey Comments on Provincial Review of A Place to Grow and Provincial Policy Statement posted on the Environmental Registry through posting # 019-6177

On behalf of the County of Grey, please find attached a copy of Grey County Staff Report PDR-CW-01-23, which represents the County of Grey's comments on the Provincial Review of A Place to Grow and Provincial Policy Statement. This Report was presented to the December 8th, 2022, Grey County Committee of the Whole meeting, where the following staff recommendation was adopted through resolution CW08-23.

- 1. That report PDR-CW-01-23 regarding the Provincial Review of A Place to Grow and Provincial Policy Statement, be received;**
- 2. That report PDR-CW-01-23 be forwarded on to the Province of Ontario as County of Grey's comments on the Provincial Review of 'A Place to Grow and Provincial Policy Statement' and associated consultation posted on the Environmental Registry through posting #019-6177;**
- 3. That the County request that the province provide a further comment period upon release of such amended, consolidated or replacement 'A Place to Grow and Provincial Policy Statement', to facilitate further review and comment on potential local impacts;**
- 4. That the report be shared with member municipalities and conservation authorities having jurisdiction within Grey County;
and,**
- 5. That staff be authorized to proceed prior to County Council approval as per Section 25.6(b) of Procedural By-law 5003-18.**

Thank you for the opportunity to provide comments on this proposed policy review.

Should you have any questions, or require any further information, please do not hesitate to contact this office.

Yours truly,

A handwritten signature in black ink, appearing to read "Scott Taylor", is written over a light yellow rectangular background.

Scott Taylor, MCIP, RPP
Director of Planning
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Enclosure: PDR-CW-01-23 Committee Report

Cc. (All by email only)
Township of Chatsworth
Township of Georgian Bluffs
Municipality of Grey Highlands
Town of Hanover
Municipality of Meaford
City of Owen Sound
Township of Southgate
Town of The Blue Mountains
Municipality of West Grey
Grey Sauble Conservation Authority
Saugeen Valley Conservation Authority
Grand River Conservation Authority
Nottawasaga Valley Conservation Authority

To:	Warden and Members of Grey County Council
Committee Date:	December 8 th , 2022
Subject / Report No:	Provincial Review of A Place to Grow and Provincial Policy Statement / PDR-CW-01-23
Title:	County Comments on Provincial Review of A Place to Grow and Provincial Policy Statement
Prepared by:	Grey County Planning Staff
Reviewed by:	Scott Taylor
Lower Tier(s) Affected:	All Municipalities
Status:	

Recommendation

1. That report PDR-CW-01-23 regarding the Provincial Review of A Place to Grow and Provincial Policy Statement, be received;
2. That report PDR-CW-01-23 be forwarded on to the Province of Ontario as County of Grey's comments on the Provincial Review of 'A Place to Grow and Provincial Policy Statement' and associated consultation posted on the Environmental Registry through posting #019-6177;
3. That the County request that the province provide a further comment period upon release of such amended, consolidated or replacement 'A Place to Grow and Provincial Policy Statement', to facilitate further review and comment on potential local impacts;
4. That the report be shared with member municipalities and conservation authorities having jurisdiction within Grey County; and,
5. That staff be authorized to proceed prior to County Council approval as per Section 25.6(b) of Procedural By-law 5003-18.

Executive Summary

The province recently released a proposal for comment via the Environmental Registry of Ontario (ERO), whereby the government proposes to integrate the Provincial Policy Statement (PPS) and A Place to Grow policy into a new province-wide policy instrument. The stated intent of the review is to determine the best approach that would enable municipalities to accelerate the development of housing and increase housing supply (including rural housing), through a more streamlined province-wide planning policy framework. Within the report, County Staff offer commentary around the proposed core elements/approaches that the province identifies could be incorporated within the new policy instrument and offers response to those questions posed by the province as part of the ERO posting.

Background and Discussion

The Provincial Policy Statement (PPS)

The Provincial Policy Statement provides overall policy direction on matters of provincial interest related to land use planning and development in Ontario, and applies province-wide, except where the policy statement or another provincial plan provides otherwise. Provincial Plans, such as 'A Place to Grow: Growth Plan for the Greater Golden Horseshoe', build upon the policy foundation provided by the PPS by providing additional policies to address issues facing specific geographic areas in Ontario.

The PPS is to be read as a whole, the policies being all-together intended to reflect and respect the complex inter-relationships among environmental, economic and social factors in land use planning. Local context is emphasized as an important consideration in determining how these outcome-oriented policies are to be implemented in a specific area, and how these factors are best balanced towards the creation of strong, livable and healthy communities which enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change.

Land use planning decisions made by municipalities, planning boards, the province, or a commission or agency of the government must be consistent with the Provincial Policy Statement. The PPS was last updated in 2020.

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

This Plan, established under the Places to Grow Act (2005), builds upon the broad policy foundation of the PPS, providing more specific direction applicable to lands within the Greater Golden Horseshoe (GGH) area of Ontario. The Plan provides population and employment forecasts for municipalities within the GGH geographic area and identifies 25 key urban growth centres which are to act as regional focal points for

accommodating population and employment growth. Grey County is not currently within the jurisdiction of the Growth Plan, though neighbouring counties such as Dufferin, Simcoe, and Wellington are within the Growth Plan. In areas outside the Growth Plan the province does not prescribe population and employment growth targets, and municipalities are responsible for identifying such projections.

The plan emphasizes the need to optimize existing urban land supply and infrastructure through an 'intensification first' approach to development and city-building, intended to minimize urban expansions. The Plan also promotes the role of rural towns and villages as a focus of economic, cultural, and social activity which support surrounding rural and agricultural areas. Farmland protection and viability of the agri-food sector in rural areas are promoted within the plan, with healthy rural communities and a diversified rural economy identified as important factors to the vitality and well-being of the broader region.

Comments on A Place to Grow and Provincial Policy Statement Review

Shared Principles, Very Different Contexts

Both plans address similar concepts, containing policies focused towards core provincial interests, as are articulated within Section 2 of the Planning Act.

Each plan aims to achieve healthy, livable and safe communities by managing and directing land use in an integrated, efficient and strategic manner. These plans provide broad policy guidance, as well as prescriptive elements (e.g. 'Shall' statements), with 'A Place to Grow' being much more prescriptive than the PPS, particularly around growth management functions such as population and employment forecasting, implementation of intensification and density targets, and the application of a specified land need assessment methodology.

Staff appreciate there may be greater need for such prescriptive approaches within the Greater Golden Horseshoe in order to facilitate coordination of community change, given the significant density of population, infrastructure and activity within and across the region. It is important to note however, that in less populous, remote and/or rural areas like Grey County, the challenges associated with coordinated and strategic land use planning may arise more so as a factor of limited municipal resourcing and capacity, rather than due to complexity. Further, given the critically important role of rural areas in food production, aggregate extraction, forestry, conservation and as natural habitat, rural planning practice includes a greater focus on protection and maintenance of such resources, alongside more traditional urban planning practice within serviced settlement areas.

Accordingly, Staff advocate for a policy instrument that will maintain appropriate structure to facilitate resource protection, alongside an intensification-first approach to settlement area planning.

This instrument must be flexible and as administratively simple as possible – while rural municipalities often successfully supplement their capacity through creative and collaborative approaches, in many cases local capacity does not exist to administer a heavily prescriptive framework.

Staff would additionally note that further policy and legislative change applicable to rural areas should be weighed carefully against the stated goals of approving housing faster to quickly increase housing supply. Staff suggest that while additional tools to facilitate affordable housing are needed locally (e.g. inclusionary zoning), the current PPS/policy framework does not otherwise represent a barrier to appropriate housing creation in Grey County and is a sound policy document, having been refined over several decades. Our local capacity can be focused towards facilitating housing creation and managing community change *or* can be expended administering and implementing legislative change - where our goal is to expedite a rapid increase in housing supply, the former should be prioritized over the latter.

Key Policy Concepts to be Maintained

As noted in the foregoing discussion, the planning context in Grey County is distinct from that of the Greater Golden Horseshoe. To facilitate rural resource protection and sustainable small-urban development, Staff would request the province maintain the following key concepts, within an updated policy instrument:

- 1) **Growth Management** – should be maintained at a County or regional scale, as minimum targets within a planning horizon, and should be based upon a simple land need assessment methodology which does not require significant local data collection to administer.
- 2) **Income-tied definition of “Affordable”** - the new policy instrument should continue to encourage a range of housing options (types, forms, arrangements) and should specifically support provision of housing that is affordable to low- and moderate-income households, for example, through broader application of an inclusionary zoning tool within serviced settlement areas. In this regard, Staff support the continued inclusion of an income-tied definition of “Affordable” rather than the market-tied definition that has been employed within Bill 23 with respect to changes to the *Development Charges Act*.
- 3) **Natural Heritage Protections** – should be maintained to preserve the natural heritage system, its ecological integrity and the ecosystem services provided. Such protections and associated process/roles should remain integrated with

natural hazard management and should be considered in the context of Watershed Planning and the protection of important hydrologic features and areas – all being functionally interrelated. Further policy and legislative changes to facilitate streamlined housing creation should support adequate resourcing of those agencies delivering natural heritage review functions, such that necessary and appropriate evaluation of natural heritage impacts can be achieved without delay to the overall development process.

- 4) **Agricultural Systems** – a systems approach should be maintained and should factor in the supportive role of rural lands in agri-food production. Enhanced levels of residential development in rural areas may undermine this role and thus should be carefully considered within each local context. Staff note that similar concerns arise with respect to forestry and aggregate-related roles of rural lands, which are not always compatible or feasible alongside residential development. Over the long-term, it is anticipated that rural lands will be increasingly needed to support domestic food production. Further, climate change impacts are expected to shift local weather patterns, groundwater recharge and water balances, which may affect availability of water resources for irrigation and livestock purposes and may impact upon the viability of individual water and sewer services for residential and other rural users. The majority of residential development should continue to be directed to fully serviced settlement areas.
- 5) **Firm Urban Boundaries** – Staff are of the opinion that the current settlement area expansion process within the PPS appropriately prioritizes intensification within the settlement boundary prior to expansion and deters ad hoc expansions which could result in negative cumulative impacts, or which may undermine municipal strategic planning. It is important that such extensions continue to be subject to fulsome review and that settlement boundaries continue to be generally maintained and regarded as ‘firm boundaries’, so as to prioritize intensification, compact form, and the economical use of infrastructure within settlement areas, and to minimize sprawl and associated farmland loss. A hierarchy of settlement areas should be maintained, with development to occur at densities commiserate with local infrastructure and/or natural carrying capacities (e.g. regarding private services; cumulative impacts) and with the majority of growth directed towards fully-serviced primary settlement areas.
- 6) **Coordinated Infrastructure & Facility Planning** – Staff support coordinated infrastructure and public service facility planning, such that local services are expanded alongside residential growth to maintain a high quality of life and efficient and economical municipal service delivery. Staff believe that a land-need and impact-evaluation process should continue to apply under the new policy instrument relating to employment area redesignation, and that Municipalities should continue to be empowered to strategically designate,

service and reserve employment lands and other special/strategic policy areas, over the planning horizon.

Additional detailed comments have been provided in Appendix 1 to this report, in response to areas the province is seeking feedback on.

Legal and Legislated Requirements

None with this report.

Financial and Resource Implications

At this stage, the financial impact of proposed policy changes is not known. Staff will continue to monitor the Provincial Policy review and will keep County Council up to date on the status and impact. An update to the PPS could trigger future updates to the County Official Plan and member municipal official plans.

Relevant Consultation

Internal: Planning

External: Member municipalities within Grey and Conservation Authorities having jurisdiction in Grey.

Appendices and Attachments

[019-6177 Review of A Place to Grow and Provincial Policy Statement](#)

[Provincial Policy Statement, 2020](#)

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

Appendix 1: Detailed Summaries and Comments on Review of A Place to Grow and Provincial Policy Statement

Item #	Core Elements Proposed / Review Question	Staff Comment
Residential Land Supply		
1	Settlement Area Boundary Expansions – streamlined and simplified policy direction that enables municipalities to expand their settlement area boundaries in a coordinated manner with infrastructure planning, in response to changing circumstances, local contexts and market demand to maintain and unlock a sufficient supply of land for housing and future growth	<p>The proposed change is to simplify and streamline the current process in a coordinated manner or based on local contexts or changing circumstances, which would make it easier for municipalities to add lands to settlement areas.</p> <p>Presently, the PPS requires that an upper tier (i.e. Grey County) identify targets for intensification and redevelopment, including minimum targets that should be met before expansion of the boundaries of settlement areas is permitted. A settlement area boundary expansion may only occur at the time of a comprehensive planning review, and only where it has been demonstrated that sufficient opportunities to accommodate growth and satisfy market demand are not available through intensification and redevelopment within existing boundaries.</p> <p>Infrastructure and public services facilities to support such expansion must be suitable and financially viable over the long-term. Further, alternate siting must be evaluated where expansion is proposed onto prime agricultural land, and such expansion must minimize impacts upon nearby agricultural operations to the greatest extent feasible. The level of detail of assessment of such extension review is to correspond with the complexity and scale of the settlement area expansion proposed and Section 1.1.3.9 of the PPS provides a lesser process for minor boundary changes where no net increase in settlement lands would occur.</p> <p>Overall, the impact of provincial changes to this process, will greatly depend on how simplified and streamlined the process becomes. Staff are of the opinion that the current process appropriately prioritizes intensification within the settlement boundary prior to expansion and deters ad hoc expansions which could result in negative cumulative impacts, or which may undermine municipal strategic planning. It is important that such extensions continue to be subject to fulsome review and that settlement boundaries continue to be generally maintained and regarded as ‘firm boundaries’, so as to prioritize intensification and the economical use of infrastructure within settlement areas, and to minimize sprawl and associated farmland loss.</p>
2	Rural Housing – policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas	<p>Rural Areas include a system of lands that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and other resource areas.</p> <p>Presently, the PPS permits ‘<i>residential development, including lot creation, that is locally appropriate</i>’ on rural lands. While the majority of residential development is directed to serviced settlement areas, the PPS establishes that within rural areas, rural settlement areas shall be a focus of growth and development. It is intended that that development in rural areas be compatible with the rural landscape and sustained by rural service levels, being appropriate to local infrastructure.</p> <p>While further flexibility within an updated policy instrument may lead to more housing being built in rural areas, servicing is an important consideration as many rural areas are privately serviced, including rural settlement areas. If natural limits to private servicing are not regarded, these rural areas could experience negative impacts, as local water supply and quality may be adversely affected. Additionally, climate change is expected to shift local weather patterns, groundwater recharge and water balances, which may affect future availability of water resources for irrigation and livestock purposes and may impact upon the viability of individual water and sewer services for residential and other rural users.</p> <p>Finally, rural areas play a critically important role in food production, aggregate extraction, forestry, conservation and as natural habitat. Grey County created a significant number of rural residential lots in the 1980’s and early 1990’s. That past lot creation has created significant barriers to local farmers and resource extraction (aggregates). Increased levels of residential development in rural areas may further undermine these roles and thus should be carefully considered within each local context.</p>

3	Employment Area Conversions – streamlined and simplified policy direction that enables municipalities to promptly seize opportunities to convert lands within employment areas for new residential and mixed-use development, where appropriate	<p>The proposed change is to provide policy direction that would make it easier for municipalities to convert identified employment areas into residential and mixed-use development. Employment area conversions are appropriate in some circumstances, depending on what employment opportunities exist or are planned within the employment area, and provided that adequate land area is maintained within the settlement area overall, to accommodate forecasted employment growth.</p> <p>Mixed-use development allows people to be closer to their work and improves the walkability of the area, as a car is no longer needed to go everywhere. That said, where an employment area is occupied by heavier industrial uses, residential development should not be located too closely. The province provides additional technical guidance (e.g. Ministry of the Environment Conservation and Parks D-series guidelines) to assist with evaluation of appropriate setbacks between varying classes of industrial use and nearby sensitive uses.</p> <p>Presently, Section 1.3.2 of the PPS speaks to Employment Areas, allowing for conversion to non-employment uses at the time of a comprehensive review (as defined within the PPS). Through a comprehensive review, the forecasted employment growth and land supply would be evaluated on a broad community-wide basis, to determine if employment lands can be converted for other purposes, while maintaining adequate designated lands to accommodate growth and without undermining strategic objectives of the Municipality.</p> <p>Section 1.3.2.5 of the PPS provides flexibility to allow for conversion in absence of a comprehensive review, provided the area has not been identified as provincially or regionally significant, and provided there is an identified need for the conversion and the land is not required for employment purposes over the long term; the proposed uses would not adversely impact the overall viability of the employment area; and, existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.</p> <p>Staff expect that the process set out by Section 1.3.2 of the PPS, together with the flexibility provided by Section 1.3.2.5, is adequate to facilitate appropriate employment land conversions within Grey County. Staff suggest that a land-need and impact-evaluation process should continue to apply under the new policy instrument, and that Municipalities should continue to be empowered to strategically designate, service and reserve employment lands for anticipated growth over the planning horizon. County Economic Development staff have stressed the importance of protecting such employment lands from incompatible development, in order to foster the expansion of local industries, such that they are not forced to relocate elsewhere.</p>
Attainable Housing Supply and Mix		
4	Housing Mix – policy direction that provides greater certainty that an appropriate range and mix of housing options and densities to meet projected market-based demand and affordable housing needs of current and future residents can be developed, including ground-related housing, missing middle housing, and housing to meet demographic and employment-related needs.	<p>Both the PPS and A Place to Grow include policies requiring the provision of an appropriate range and mix of housing options and densities. A minimum 15-year supply of designated lands must be maintained to accommodate forecasted residential growth through residential intensification and redevelopment.</p> <p>The new policy instrument should continue to encourage a range of housing options (types, forms, arrangements) and should specifically support provision of housing that is affordable to low- and moderate-income households. In this regard, Staff support the continued use of income-tied definition of “Affordable” rather than the market-tied definition that has been employed within Bill 23. A definition for ‘attainable housing’ would also be good consideration for inclusion in the PPS.</p>
5	Major Transit Station Areas – policy direction that provides greater certainty that major transit station areas would meet minimum density targets to maximize government investments in infrastructure and promote transit supportive densities, where applicable across Ontario	<p>There are presently no Major Transit Station Areas identified within Grey County, to which policies would apply. Staff would be generally amenable to further discussions with the province around how transit-supportive densities can be better achieved in Grey County. Perhaps an opportunity exists for designation of a rural-node/equivalent of an MTSA within strategic locations (e.g. regional centres, concentrated areas of employment) outside of the Greater Golden Horseshoe.</p>
6	Urban Growth Centres – policy direction that enables municipalities to readily identify centres for urban growth (e.g., existing or emerging downtown areas) as focal points for	<p>The proposed change is to make it easier for municipalities to identify areas for intensification, to support creation of sufficient supply of housing and business/employment/amenity within a close distance. Staff anticipate that increased flexibility may be identified as a need within the Greater Golden Horseshoe, given the more prescriptive existing approaches to growth management under ‘A Place to Grow’.</p>

	intensification and provides greater certainty that a sufficient amount of development, in particular housing, will occur	<p>The policy approaches provided for under the current PPS are appropriately flexible to facilitate intensification within primary settlement areas in Grey County.</p> <p>In Grey County, forecasted growth is allocated to local municipalities with the understanding – as articulated by the PPS - that the majority of growth will occur within (serviced) primary settlement areas. The County Official plan establishes a minimum residential density of 25 units/net hectare in these primary settlement areas and encourages the identification of planned low, medium and higher-density development areas within local planning documents. Lower-tier municipalities have discretion to establish locally higher minimum densities as they deem appropriate, for example to direct density to ‘downtowns’ or business districts, or to support viable/economical use of planned infrastructure in special policy or secondary plan areas.</p>
Growth Management		
7	Population and Employment Forecasts – policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment	<p>The proposed change is to ensure there is easier access for municipalities to access the latest growth and employment forecasts. This change may positively support municipalities in planning and identifying those areas that will see growth and ensuring that local housing needs can be met.</p> <p>Grey County retains an economic expert periodically, to update growth management forecasts for the County and member municipalities. Staff would be generally supportive of the creation of a more standardized projection methodology, which perhaps could be incorporated within the new policy instrument, or as a standalone guidance document. Staff respect the fact that to some degree this work embodies both an art and a science, and thus Staff expect that appropriate flexibility would need to be maintained within such methodology.</p>
8	Intensification – policy direction to increase housing supply through intensification in strategic areas, such as along transit corridors and major transit station areas, in both urban and suburban areas	<p>As described with respect to ‘Urban Growth Centres’ above, Staff are of the opinion that the policy approaches provided for under the current PPS are appropriately flexible to facilitate intensification within primary settlement areas in Grey County. Additional tools or approaches to facilitate or require “affordable” housing within these areas are welcomed. Although outside of the PPS, staff would continue to advocate for the appropriate infrastructure funding tools, such as the use of Development Charges to support growth and intensification efforts by municipalities.</p>
9	Large and Fast-growing Municipalities – growth management policies that extend to large and fast-growing municipalities both inside and outside of the Greater Golden Horseshoe, including the coordination with major provincial investments in roads, highways and transit	<p>It is unclear what municipalities would be considered “large and fast-growing” and a definition would be helpful in this regard.</p> <p>Coordination of local municipal planning with major provincial investments in roads, highways and transit is generally supported.</p>
Environment and Natural Resources		
10	Agriculture – policy direction that provides continued protection of prime agricultural areas and promotes Ontario’s Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations	<p>Continuing to protect prime agricultural lands is an important and positive continuation from the current plans. Increased flexibility for residential development in rural areas however, may result in negative outcomes and should be carefully considered.</p> <p>Directly, such outcomes could include the removal of lands from agricultural production for residential use. Indirectly, the introduction of distributed residential development could result in user conflicts with nearby agricultural/forestry/aggregate operations (e.g. due to noise/dust/odour/vibration) or could potentially prohibit establishment/expansion of livestock facilities as a result of minimum setbacks required between agricultural operations and nearby dwellings.</p> <p>As described above (re: Rural Housing), private servicing capacity limitations, the potential future impacts of climate change, and the multiple important and sometimes conflicting roles of rural areas must be considered when entertaining any expansion of permissions for rural residential development.</p>
11	Natural Heritage – streamlined policy direction that applies across the province for Ontario’s natural heritage, empowering local decision making, and providing more options to reduce development impacts, including offsetting/compensation	<p>Protections should be maintained to preserve the natural heritage system, its ecological integrity and the ecosystem services provided. Wetlands, for example, offer not only natural habitat but also deliver natural stormwater management functions, helping to mitigate flooding and contributing towards climate change mitigation/adaptation.</p> <p>It is the opinion of Staff that such natural heritage protections and associated process/roles should be integrated with natural hazard management and should be considered on a Watershed basis alongside the protection of important hydrologic features and areas – all being</p>

12	Natural and human-made hazards - streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk	<p>functionally interrelated. In a Grey County context, Staff would support a continued option to partner with local Conservation Authorities in review of natural heritage features and assessment of potential development-related impacts.</p> <p>Offsetting and/or compensation approaches may be appropriate in certain situations to help balance the negative impacts of development on biodiversity through positive actions such as habitat restoration, creation or enhancement. In this way offsetting represents an opportunity to integrate the environmental costs of development, into the decision-making process. However, clear guidance must be established for where this tool can be reasonably applied such that it does not instead have the effect of undermining natural heritage protections or promoting biodiversity loss. Appropriate avoidance, minimization and on-site rehabilitation measures should be first considered, and offsetting/compensation should be targeted towards a net gain (or no net loss) in biodiversity, sustained over the long-term.</p> <p>Current PPS policies are clear in stating that development will not occur within either natural hazard lands or human-made hazard lands, as doing so could lead to negative health and safety impacts. This protective function – intended to minimize risks of development to persons and property - should be maintained within the new policy instrument.</p>
13	Aggregates – streamlined and simplified policy direction that ensures access to aggregate resources close to where they are needed	Further detail regarding intended policy direction is necessary to provide fulsome comment on this item. An appropriate evaluation process should be maintained for establishment of new extractive operations.
14	Cultural heritage –policy direction that provides for the identification and continued conservation of cultural heritage resources while creating flexibility to increase housing supply	Further detail regarding intended policy direction is necessary to provide fulsome comment on this item. Loss of locally significant cultural heritage features should be minimized.
Community Infrastructure		
15	Infrastructure Supply and Capacity – policy direction to increase flexibility for servicing new development (e.g., water and wastewater) and encourage municipalities to undertake long-range integrated infrastructure planning	Further detail regarding intended policy direction is necessary to provide fulsome comment on this item. Staff generally support long-range integrated infrastructure planning.
16	School Capacity – coordinated policy direction that ensures publicly funded school facilities are part of integrated municipal planning and meet the needs of high growth communities, including the Ministry of Education’s proposal to support the development of an urban schools’ framework for rapidly growing areas	Staff generally support coordinated planning for school capacity and other public service facilities. Better integration of school planning, through effective relationship and communication with local School Boards is expected to bring positive outcomes and may facilitate strategic planning, data sharing, and/or co-location of other supportive infrastructure or services (e.g. transit routes; school active travel routes; child care centres etc.)
Streamlined Planning Framework		
17	Outcomes-Focused – streamlined, less prescriptive policy direction requiring fewer studies, including a straightforward approach to assessing land needs, that is focused on outcomes	An outcomes-focused, relevant and flexible policy framework is generally desirable, though specific detail is necessary to evaluate whether proposed changes will encourage positive or negative outcomes in the Grey County context. For example, a simplified approach to land need assessment could be beneficial, however sufficient detail must be incorporated such that the outputs of the assessment are meaningful and are useful to inform decision-making.
18	Relevance – streamlined policy direction that focuses on the above-noted land use planning matters and other topics not listed that are also key to land use planning and reflect provincial interests	
19	Speed and Flexibility – policy direction that reduces the complexity and increases the	

	flexibility of comprehensive reviews, enabling municipalities to implement provincial policy direction faster and easier	
Questions		
20	What are your thoughts on the proposed core elements to be included in a streamlined province-wide land use planning policy instrument?	Staff offer commentary within this appendix and throughout the body of the report relating to key elements we believe should be maintained within a revised policy instrument. Additional detail on a number of the items listed within the ERO posting will be necessary to facilitate more fulsome evaluation of potential local impacts.
21	What land use planning policies should the government use to increase the supply of housing and support a diversity of housing types?	Staff suggest that while additional tools to facilitate affordable housing are needed locally (e.g. inclusionary zoning), the current PPS/policy framework does not otherwise represent a barrier to housing creation in Grey County.
22	How should the government further streamline land use planning policy to increase the supply of housing?	It is appreciated that more significant policy change or streamlining may be warranted within a Greater Golden Horseshoe context to address policy barriers to housing creation that may have been identified in those communities. It is important to note however, that in less populous, rural areas like Grey County, the delivery of coordinated and strategic land use planning may at times be challenged due to limited municipal capacity. As the overall objective of this policy review is to expedite housing creation, it is respectfully suggested that the province consider incremental, geographically-targeted changes to address specific policy barriers, rather than instituting broad, province-wide changes to the overall planning framework. We would far prefer that local capacity be targeted towards facilitating housing creation and managing community change, rather than be expended in administering and implementing legislative and policy change of marginal local benefit.
23	What policy concepts from the Provincial Policy Statement and A Place to Grow are helpful for ensuring there is a sufficient supply and mix of housing and should be included in the new policy document?	Staff find the PPS to be a sound, comprehensive policy document, having been refined with local input, over several decades. Staff support the continued maintenance of the policy concepts presently within the PPS and suggest that the new policy instrument should continue to encourage a range of housing options (types, forms, arrangements) and should specifically support provision of housing that is affordable to low- and moderate-income households, for example, through broader application of an inclusionary zoning tool within serviced settlement areas. In Grey County, a range of housing options exist that would be attainable or affordable to 'high income' households, earning >120% of local median household income but housing supply affordable to low- and moderate-income households is increasingly limited. Given the substantial shoreline, seasonal and luxury component of our real estate market, it is understood locally that average market figures may be skewed upwards by these big-ticket properties, this metric being disconnected from local incomes and the capacity of local households to pay for housing. In this regard, Staff support the continued inclusion of an income-tied definition of "Affordable" rather than the sole market-average-tied definition that has been employed within Bill 23-related changes to the <i>Development Charges Act</i> . A definition for attainable housing which is also tied to income would also be beneficial.
24	What policy concepts in the Provincial Policy Statement and A Place to Grow should be streamlined or not included in the new policy document?	Staff suggest that additional wording on indigenous relationship building, and engagement may be useful within the PPS.