

Appendix 'A'

Response to Questions Provided in ERO Posting #019-6813

#	Question	Response
1	What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?	<p data-bbox="716 363 1424 590">In considering the integration of A Place to Grow and PPS it is important to identify and discuss the significance of certain phrases in the Planning Act as they have considerable importance to the approvals processes under the Act. Those words are “have regard to”, “shall be consistent with”, and “shall conform with”.</p> <p data-bbox="716 632 1424 957">The Planning Act identifies matters of provincial interest and identified that the Minister, municipal councils, and the Tribunal, in carry out their responsibilities under the act, shall have regard to matters of provincial interest. Many of the matters listed in the Planning Act are policy areas that are impacted by the 2023 PPS, such as the protection of ecological systems, including natural areas, features and functions and the protection of agricultural resources.</p> <p data-bbox="716 999 1424 1125">With respect to decisions, the Planning Act requires consistency with policy statement in effect on the date of decision, and conformity with Provincial Plans such as A Place to Grow and Greenbelt Plan.</p> <p data-bbox="716 1167 1424 1661">The phrase “shall have regard to” requires applicable matters to be taken into consideration when making a decision. The phrase “shall be consistent with” is a higher policy implementation standard and is a more demanding test than “shall have regard for”. It requires decision makers to apply the policies and make decisions that are consistent with the applicable policies. It is a stronger implementation standard focusing on the achievement of policy outcomes, while retaining some flexibility for how it is implemented. The phrase “shall conform with” is a ridged policy implementation standard and is a more demanding test than “shall be consistent with”. If something does not conform or comply with, or conflicts with the rules or policies, it is not permitted.</p> <p data-bbox="716 1703 1424 1896">By shifting policies that are currently in A Place to Grow to the PPS, the standard or test changes from “shall conform with” to “shall be consistent with”, which will increase the flexibility in the application of the policies. The 2023 PPS also increases the use of more flexible language, such as “encourage” and</p>

		<p>“may” which will further increase the flexibility in the application of the policy. While increased flexibility can be beneficial at times to allow for local circumstances to be accounted for, it can present a challenge in defending certain policies directions that the local municipality may wish to advance.</p> <p>Defending policies that are more restrictive than the 2023 PPS may become challenging if the policies are viewed as being too restrictive to the point where they inconsistent with the 2023 PPS.</p>
2	<p>What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?</p>	<p>King Township is not identified as a large and fast-growing municipality. This means that the Township’s major transit station area (MTSA) is not recognized, and the Township’s intensification and density targets are not carried forward. Staff have concerns with this change as it may encourage unmanaged growth within the Township and may discourage intensification in proximity to transit and existing community services.</p> <p>Staff have no concerns with large and fast-growing municipalities being identified, however Staff encourage the Province to consider policies for intensification, density and built-up areas for smaller municipalities that are also experiencing growth pressures.</p>
3	<p>What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?</p>	<p>Staff encourage the Province to include density and intensification targets for housing supply to encourage housing development in proximity to existing services rather than encouraging unmanaged growth (sprawl) into rural and agricultural areas. Staff also note that if the goal of the draft PPS is to increase housing supply to resolve affordability then the PPS should include targets to monitor success. The Statement should also acknowledge the relationship between health and the built and natural environment and should encouraging the housing supply to not only be of an appropriate range and mix of housing options, but to encourage healthy and sustainable housing developments.</p>
4	<p>What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?</p>	<p>As the draft policies on natural heritage and environmental protection have not been released in the draft 2023 PPS it is impossible to determine the potential impacts of the policies on the conservation of natural heritage. However, natural heritage and environmental protection are already at risk due to the recent policy changes through Bill 23 and the diminished role of Conservation Authorities. Staff understand the Province’s goal of streamlining the review of development applications and removing</p>

obstacles to increasing housing supply, however the policies appear short-sighted and the policy changes should not come at the expense of sufficient environmental protection or health and safety.

Staff also have concerns regarding the potential loss of agricultural lands through permitting severances in prime agricultural areas. It is Staff's understanding that the policies of A Place to Grow and the PPS were to encourage agricultural in prime agricultural areas, and to promote viability of agricultural through discouraging fragmentation and encouraging the preservation of large agricultural parcels. Staff acknowledge that agricultural can occur in differing intensities and on different scales, however by fragmenting agricultural lands for residential uses it may promote estate residential development rather than small-scale farm establishments. Staff recommend that the Province direct housing to settlement areas where lands can accommodate growth and where servicing is available rather than encouraging the encroachment of residential development within the agricultural system.

There have already been significant changes to cultural heritage preservation policies through Bill 23. The proposed PPS continues to limit cultural heritage preservation by revising definitions and wording in the draft PPS policies and the associated definitions. Staff recommend adding non-designated properties to the definition of "protected heritage property" to ensure that these excluded properties are acknowledged and recognized as important cultural heritage resources worthy of conservation.

Staff also recommend revising the definition for "adjacent" in relation to cultural heritage to broaden the scope for what can be established as an adjacent property. Currently, the PPS provides flexibility with the option to expand upon the definition of "adjacent lands". The Township's Official Plan expands upon the definition by adding that lands within 30 metres of the development property may be subject to providing study materials as per the Township's request. The removal of the policies in the draft PPS would reduce the area in which the Township can request for evaluations or study documents (i.e., Heritage Impact Assessments, etc.) which may be useful in determining appropriate mitigation measures required for projects with sensitive heritage properties in high development areas.

5	<p>What are your thoughts on the proposed policies regarding planning for employment?</p>	<p>The proposed planning for employment raises concerns from Staff as it may not allow for diversity of uses within Employment Areas and has the potential to allow for conversions of employment uses (office, institutional, etc.) into residential uses. Staff identify that the proximity in residential uses to employment uses may result in land use compatibility concerns. The potential loss of employment lands to residential uses without the need for an Employment Area Conversion also has the potential to result in an inadequate supply of employment lands which may increase the cost of employment lands and stifle small businesses.</p>
6	<p>Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?</p>	<p>Many of the aspects listed in the question are not barriers to development and construction but instead are tools to ensure that new development and construction is of a high quality and is sustainable, durable and aids in the development of healthy and complete communities.</p> <p>To accelerate development and construction submissions for development applications should be complete and of a high-quality to enable municipalities to undertake a thorough review within the application review timeframes set out in the Planning Act. Any necessary resubmissions should also be provided in a timely manner to allow for the applications to be reviewed promptly.</p> <p>A potential barrier is infrastructure, including water and wastewater servicing within settlement areas and growth areas where servicing capacity may not be able to keep up with the forecasted growth in the area. The Province should focus funding and resources to improve infrastructure within these areas to allow for intensification and growth to occur, and for housing to be constructed.</p>