

May 10, 2024

Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

****SUBMITTED ELECTRONICALLY****

RE: Environmental Registry of Ontario Posting 019-8462: Review of proposed policies for a new provincial planning policy instrument.

Please accept this letter in response to the Environmental Register of Ontario (ERO) proposal 019-8462 concerning the proposed policies for a new provincial planning policy instrument. The City of Barrie provided comments during the previous consultation for the new provincial planning policy instrument in August 2023. Staff have undertaken a review of the new proposal and offer the following comments.

Proposal Summary

The proposed policies aim to support increased intensification, such as around transit areas and the redevelopment of low-density commercial spaces, while also provide protections for employment areas and promoting a range of housing options, including other for students and seniors. The proposed Provincial Planning Statement (PPS) also provides policy direction tailored to Ontario's largest and fastest growing municipalities, with the City of Barrie being identified as one.

Comments

a. What are your overall thoughts on the updated proposed Provincial Planning Statement?

The Provincial Planning Statement (PPS), 2024 appears largely similar to the 2023 version which the City of Barrie provided substantive comments on, and those comments continue to be the City's position. The PPS, 2024 realigns land use planning in Ontario towards addressing the demand for housing, and while we agree that housing supply needs to be a focus for Ontario, we stress that it must be achieved in a way that balances environmental protection and sustainability.

b. What are your thoughts on the ability of updated proposed policies to generate appropriate housing supply, such as: intensification policies, including the redevelopment of underutilized, low density shopping malls and plazas; major transit station area policies; housing options, rural housing and affordable housing policies; and student housing policies?

The City of Barrie is committed to meeting the housing targets outlined in Bill 23. The City has already implemented several policies to support housing supply and intensification. These include providing a range of housing, intensification, and density targets in the urban growth center, major transit station areas, and strategic growth areas where transit is available.

Affordable housing continues to be a main focus, and we were pleased to see the release of the Minister's "affordable residential units bulletin" that defines the thresholds for affordable ownership and rentals. A definition for attainable housing would be helpful. Providing adequate student housing is essential and staff are pleased to see student housing contemplated in the proposed PPS, 2024. The City of Barrie continues to collaborate with Georgian College to develop their student housing strategy and look for housing options targeted to students.

- c. *What are your thoughts on the ability of the updated proposed policies to make land available for development, such as: forecasting, land supply, and planning horizon policies; settlement area boundary expansions policies; and employment area planning policies?*

Compared to the last draft of the proposed PPS, the City of Barrie appreciates the improved clarity requiring municipalities to plan for growth by providing a planning horizon with a minimum 20 years and a maximum 30 years. It is our interpretation that we shall base our population and employment forecasts on the Ministry of Finance 25-year projections, and we may modify as appropriate, allowing for us to continue to do long-range employment and population forecasting to accommodate a full 30-year planning horizon. Understanding that municipalities within the Greater Golden Horseshoe are required to use forecasts issued by the Province through schedule 3 of the Growth Plan, we would ask that further direction be provided as to whether future growth forecasts will be provided beyond 2051. Consistent forecasts across Ontario will provide continuity in the approach to growth management.

In terms of the settlement boundary expansions, the City of Barrie's settlement area boundary coincides with the municipal boundary and expansion regulations do not pertain to us.

The employment area policies within the new PPS are a concern to the City of Barrie, as the new PPS requires us to plan and protect industrial uses based on a very narrow, scoped definition of "employment". While narrowing the definition effectively prohibits certain uses from locating within employment areas, protecting them for long-term industrial uses is generally supported. Lands which do not meet the definition of "employment" are to be removed from employment areas, and these lands (now known as "employment outside of Employment Areas") are then required to support a diverse mix of land uses, including residential uses. The narrowing of the definition means that municipalities will need to evaluate their employment areas to determine which lands should continue to stay designated as such and which lands are required to be redesignated to permit a broader mix of uses.

The definition of "employment area" includes areas of land designated in an official plan for clusters of business and economic uses is an area of employment (*Planning Act* Section 1(1.1)), but does not contemplate large, single users, such as warehouses or distribution centres. Further clarification on this matter would be appreciated.

Locally, the change in the definition of "employment" and the proposed changes to employment conversions (which give municipalities greater control over Employment Area removals), will affect lands in the City of Barrie that are currently designated as Employment in the City's Official Plan, and contain an institutional or commercial use (including retail, office, or recreational uses). These lands will no longer be subject to the employment area policies of the PPS, as they are no longer permitted uses within the Employment Area. The proposed PPS will permit employment conversions to occur at any time outside of a Municipal Comprehensive Review, subject to a limited demonstration that the land is not required for an employment area over the long term. The City of Barrie has concerns that this change has the potential to erode the protected Employment Area and the employment land supply and may also impact economic development and result of further delays to the implementation of our Official Plan.

d. *What are your thoughts on updated proposed policies to provide infrastructure to support development?*

Requiring municipalities to plan for essential infrastructure such as water, wastewater, and transportation systems is critical for sustainable development. Encouraging coordination between land use and transportation planning will help mitigate congestion and promote transit-oriented development. Requiring all municipalities to consider allocation, or potentially reallocation of unused servicing capacity, to accommodate projected needs for housing is a tool we have considered to help spur housing development and is generally supported. The City of Barrie supports the greater emphasis on coordination for public service providers and believes there is value in looking for opportunities for co-locating and partnering on enhancements to the public realm, to promote cost-effectiveness and facilitate service integration, access to transit, and active transportation.

e. *What are your thoughts on updated proposed policies regarding the conservation and management of resources, such as requirements to use an agricultural systems approach?*

The City of Barrie was pleased to see Chapter 4 included in PPS, 2024, valuing the protection of natural heritage features. It is important that these policies are aimed at conserving agricultural land, protecting natural heritage features, and addressing climate change impacts, and it demonstrates a commitment to environmental sustainability.

f. *What are your thoughts on any implementation challenges with the updated proposed Provincial Planning Statement?*

Implementation of the employment area definitions are unclear respecting whether a conformity review exercise will be required to address policy 2.8.2.4.

Overall, the proposed approach to implementation, including early engagement with Indigenous communities and coordination among planning authorities, appears to prioritize inclusivity and collaboration. However, careful consideration will be needed to address potential challenges and ensure consistency in decision-making across jurisdictions.

g. *What are your thoughts on the proposed revocations in O.Reg. 311/06 (Transitional Matters - Growth Plans) and O.Reg. 416/05 (Growth Plan Areas)?*

Given that the City of Barrie has been identified as a large and fast-growing municipality in Schedule 1 of the proposed PPS, 2024 the City of Barrie has no specific concerns over the proposed revocations in O.Reg. 311/06 or O.Reg. 416/05.

Thank you for the opportunity to comment on this proposal.

Respectfully,



Michelle Banfield, RPP,
Executive Director of Development Services

cc Mayor Alex Nuttall
Michael Prowse, CAO, City of Barrie
Wendy Cooke, Clerk, City of Barrie