

Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

May 10, 2024
File: 11282

**Re: Comment Letter – Review of Proposed Policies for a New Provincial Planning Policy Instrument
ERO Number: 019-8462**

Weston Consulting is the Planner for Keswood Holdings Inc., the owner of lands located east of Woodbine Avenue and south of Glenwoods Avenue within the Town of Georgina (herein referred to as “the subject property”). The subject property is located within the Keswick Business Park Secondary Plan area. The Secondary Plan policy framework established for this area allows for a range of employment uses including industrial uses, office uses and commercial uses in the form of ancillary retail and service uses. The purpose of this letter is to provide a formal submission in response to the newly proposed policy direction for employment areas as outlined in the proposed 2024 Provincial Planning Statement (ERO 019-8462) (herein referred to as the “new PPS”).

Proposed Changes under the New PPS

The Ministry of Municipal Affairs and Housing (MMAH) is proposing changes to the existing Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe by creating one document, the new PPS, which is intended to provide a streamlined province-wide land use planning policy framework. The new PPS proposes changes to various policies under the existing provincial policy framework, including the policies related to employment. We have reviewed the new proposed employment policies and have concerns with the following policies specifically:

“2.8.2.3 Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:

- ... b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
- c) prohibiting retail and office uses that are not associated with the primary employment use; ...”*

As it relates to policy 2.8.2.3 b) and c) the concern is specific to the prohibition of commercial uses and retail uses respectively, which under the current policy framework are permitted uses within an employment area. In addition to the proposed prohibition policies, the new PPS redefines the term “Employment Area” as follows:

Employment area: *means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.*

Sub-section 1(1.1) of the *Planning Act* referenced above, which is not yet in full-force and effect, is intended to limit commercial uses, including non-accessory retail and office uses, from being permitted in an employment area. We recognize that ancillary facilities to employment areas would be permitted, though this still places a limitation on the type of commercial uses permitted and is especially limiting for isolated employment lands which are not located within a large employment area where these types of ancillary facilities would be warranted. This modified definition provides a one-size fits all approach which doesn’t consider the unique characteristics some employment lands maintain, such as environmental constraints or geometry, which limits the development potential of a property for larger scale employment uses such as warehousing or manufacturing.

Comments

These proposed polices in the new PPS are an issue from our perspective as they limit the range of uses, particularly commercial uses, that can be located within an employment area. The employment policies in the new PPS direct that promoting economic development and competitiveness requires “*providing opportunities for a diversified economic base*” and supporting a “*wide range of economic activities and ancillary uses*” (Policy 2.8.1.1 b)). The new PPS prohibition policies are not in keeping with this policy direction. We understand and appreciate that employment areas need to be protected and preserved for traditional employment uses such as warehousing and manufacturing, but there also needs to be flexibility to allow for other compatible commercial uses, which will achieve the goal of promoting economic development and competitiveness. There are several municipalities that allow for commercial uses in an employment land use designation but put a limit on the amount of commercial gross floor area permitted. This approach ensures that the objective of protecting and preserving employment areas for the types of uses the new PPS is promoting is achieved, while still allowing for some commercial uses. This is a better approach than implementing prohibition policies.

It is our opinion that, if the new PPS is approved, it should include policies to ensure that existing employment areas will not be impacted in order to avoid disrupting current development planning processes. This would only further delay the development of employment uses across the province.

The policy direction outlined in the new PPS places limitations on the development of employment lands. We do not agree with the prohibition policy proposed for commercial uses and ask that it be reconsidered in order to allow for more flexibility which would allow for a greater mix and range of uses within employment areas.

We thank you for the opportunity to provide these comments. Should you have any questions, please contact the undersigned.

Yours truly,

Weston Consulting

Per:



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