

Attachment 1

Policy-Specific Comments on Proposed Amendment 1 to the Growth Plan (2017) Organized by Chapter

1. **Context (2.1)**

Current Policy

The context section of the Growth Plan (2017) makes the case for why a Growth Plan (2017) is necessary to accommodate the rapid growth of the Greater Golden Horseshoe and address the myriad challenges it faces.

Proposed Changes

Several references to “urban sprawl” have been changed to “unmanaged growth”. It is also noted that greenhouse gas emissions targets have been reduced in paragraph four from “below 1990 levels by 37 per cent by 2030 and by 80 per cent by 2050” to “reduce greenhouse gas emissions by 30 per cent below 2005 levels by 2030.”

Further, it is noted that in paragraph eleven, a change has been made from “Communities need to grow at *transit-supportive* densities” to “Communities **in larger urban centres** need to grow at *transit-supportive* densities” (emphasis added).

2. **Delineated Built-up Areas (2.2.2)**

a. Current Policy

The Growth Plan (2017) requires a phased approach to minimum intensification targets for residential development within Provincially delineated built-up area boundaries.

The annual minimum intensification target of 40% will apply until the Region completes the next Municipal Comprehensive Review (MCR). After the next Municipal Comprehensive Review, a new minimum intensification target of 50% will apply across the Region until 2031. By 2031, a 60% intensification target will apply to 2041. Existing densities, as mandated by the in-effect Regional Official Plan, will continue to apply.

Proposed Change

The proposed amendment maintains the requirement that a minimum 60% of all residential development occurring annually in York Region be within the delineated built-up area. The target date for achieving this density has been changed from 2031 to “by the time the next Municipal Comprehensive Review is approved and in effect”. Until the next MCR is in effect the annual minimum intensification target contained in the upper tier official plan will continue to apply.

Comment

The City is well positioned to accommodate the proposed minimum intensification targets and has no objection to the minimum intensification targets proposed for York Region.

Recommendation

That the City advise the Province of its support for an increased intensification requirement, and that alternative targets should be requested at the time of a MCR.

b. Current Policy

Growth Plan (2017) policy 2.2.2.4.a states that all municipalities will “encourage intensification generally to achieve the desired urban structure”.

Proposed Change

Amendment 1 proposes to delete this policy and replace it with: “encourage intensification generally throughout the delineated built-up area.” This reflects the language used in the 2006 Growth Plan (proposed policy 2.2.2.3.c).

Comment

The City, among others, requested that the 2006 language be replaced as it was used to undermine the allocation of densities on the basis of well-defined intensification areas.

The current policy encourages intensification to achieve the urban structure of each municipality, which is generally supported by transit and other infrastructure. The proposed change encourages intensification throughout the built-up area. Municipalities have spent considerable time and resources consulting with the public and developing plans that direct growth to meet the Provinces population and employment targets. The proposed changes may potentially rationalize intensification proposals in stable neighbourhoods.

Recommendation

It is recommended that policy 2.2.2.4.a be maintained.

c. Current Policy

When upper/single tier Councils consider an alternative minimum intensification target, it is required to occur through a Municipal Comprehensive Review and demonstrate that the alternative target will (policy 2.2.2.5):

- maintain or improve the existing minimum intensification target
- account for infrastructure, public service facilities, capital planning
- consider the actual intensification rate being achieved
- support the achievement of complete communities

Proposed Change

The proposed amendment removes the requirement that alternative targets be determined through a MCR, and removes the criteria (mentioned above) that the alternative target would be subject to.

Comment

An alternative target should be requested during a MCR. This would take advantage of the full analysis that takes place during the MCR to determine what level of intensification is achievable.

Recommendation

It is recommended that alternative targets only be requested at the time of a MCR to take advantage of the growth management and forecasting work that takes place during a MCR.

d. Current Policy

The Growth Plan (2017) requires that municipalities “identify the appropriate type and scale of development and transition of built-form to adjacent areas” as part of their strategy to achieve the minimum intensification targets (policy 2.2.2.4.b).

Proposed Change

The proposed change modifies the policy to only refer to Strategic Growth Areas (SGA’s) “identify the appropriate type and scale of development in **strategic growth areas** and transition of built form to adjacent areas”.

Comment

The proposed change limits municipalities identification of the appropriate type and scale of development and transition of built form to SGA’s and their adjacent areas (proposed policy 2.2.2.3.c).

Recommendation

It is recommended that policy 2.2.2.4.b of the Growth Plan (2017) be maintained to encourage appropriate transition of built-form to adjacent areas from all intensification areas.

3. Transit Corridors and Station Areas (2.2.4)

Current Policy

The Growth Plan (2017) requires that municipalities delineate (single and upper tier) and set density targets (upper in consultation with lower tier) for MTSA’s through a MCR (policy 5.2.3.2.b and policy 5.2.5.3.c).

Proposed Change

Upper tier municipalities may delineate the MTSA boundaries and identify the minimum density requirements for the MTSA’s in accordance with SS. 16(16) of the *Planning Act*, in advance of the next MCR (proposed policy 2.2.4.5).

Comment

This process is already underway in coordination with Regional staff through the current MCR. The new provision would not likely result in a more expedited process.

Recommendation

It is recommended that the modification be supported.

4. Employment (2.2.5)

a. Current Policy

The conversion of lands within employment areas to more sensitive non-employment uses like residential or places of worship can only occur during a Municipal Comprehensive Review.

Proposed Change

A one-time window is proposed to allow for conversions take place “until the next Municipal Comprehensive Review”, subject to criteria (proposed policy 2.2.5.10).

Comment

A few things would need to be clarified:

- i. Who can initiate the process?
- ii. Are decisions appealable?
- iii. What is the process for considering conversions in advance of the next MCR?

Recommendation

It is recommended that guidance be provided on the ERO website so that municipalities have an opportunity to consider how the proposed policy change would be implemented.

b. Current Policy

The introduction of major retail into an employment area can only be considered through a Municipal Comprehensive Review (policy 2.2.5.9).

Proposed Change

To permit the introduction of major retail into employment lands until the next Municipal Comprehensive Review (proposed amendment to policy 2.2.5.11).

Comment

The proposed policy permits the introduction of major retail into employment areas outside of a Municipal Comprehensive Review.

Recommendation

It is recommended that policy 2.2.5.9 of the Growth Plan (2017) be maintained.

5. Designated Greenfield Areas (2.2.7)

a. Current Policy

Designated Greenfield Areas are lands within settlement areas located outside of the delineated built-up areas (that have been designated in an Official Plan for

development), which are required to accommodate forecasted growth to the horizon of the Growth Plan (2017).

Under the Growth Plan (2006), the DGA density target was 50 people and jobs combined per hectare. Under the Growth Plan (2017), the existing DGA is subject to a density target of 60 people and jobs combined per hectare (policy 2.2.7.4).

Until the next Municipal Comprehensive Review, the density target in the Official Plan of the upper-tier municipality will continue to apply (policy 2.2.7.4). For example, this includes Blocks 27 and 41, which have a density target of 70 people and jobs combined per hectare.

New DGA's (added through an urban expansion, if required) are required to achieve a minimum density target of 80 people and jobs combined per hectare.

Proposed Change

To lower the minimum density requirement for newly added DGAs in York to 60 residents and jobs per ha (proposed amendment to policy 2.2.7.2).

Comment

Vaughan's New Community Areas (Blocks 27 and 41) are already planned with density targets of 70 people and jobs combined per hectare.

Recommendation

Staff recommend including a policy that requires any alternative intensification target to be higher than historic intensification levels.

b. Current Policy

Councils may request an alternative target for newly added DGAs through a MCR, subject to criteria so that the alternative target will:

- not be less than the minimum density target in the official plan that is approved and in effect
- reflect documented actions taken to increase planned densities in accordance with policy 2.2.7.4 a) ii)
- achieve a more compact built form that supports existing or planned transit and active transportation to the horizon of this Plan
- account for existing and planned infrastructure, public service facilities, and capital planning
- account for lands built and planning matters that are approved and in effect
- support the diversification of the total range and mix of housing options in designated greenfield areas to the horizon of this Plan, while considering the community character
- support the achievement of complete communities

Proposed Change

A new policy which allows Councils of upper and single tier municipalities to request an alternative DGA target where it is demonstrated that the target cannot be achieved

and that the alternative target will support the diversification of the range and mix of housing options, and the achievement of a more compact built form in designated greenfield areas in a manner that is “appropriate given the characteristics of the municipality and adjacent communities” (proposed policy 2.2.7.4).

Comment

The proposed change removes a requirement that Councils request alternative targets through a Municipal Comprehensive Review and removes criteria to ensure a minimum density target in effect as of July 1, 2017 is maintained in absence of a new minimum. These changes do not address the primary challenge for development in these areas: a lack of servicing.

Recommendation

It is recommended that consideration of alternative targets by upper and single tier municipalities only occur through a MCR. Staff also recommend a requirement that any alternative intensification target be higher than historic intensification levels.

6. Settlement Area Boundary Expansions (2.2.8)

a. Current Policy

Settlement area boundary expansions may only occur through a Municipal Comprehensive Review.

Proposed Change

A new policy has been proposed that would allow municipalities to adjust settlement area boundaries outside of a Municipal Comprehensive Review (proposed policy 2.2.8.4).

Comment

The proposed policy would allow settlement boundary adjustments to occur outside a Municipal Comprehensive Review process. The land needs assessment undertaken through an MCR is the tool for determining whether there is a need for additional land to accommodate growth that can't be accommodated through intensification or development in designated greenfield areas.

Recommendation

It is recommended settlement area boundary expansions only be requested at the time of a MCR to take advantage of the growth management and forecasting work that takes place during the MCR. It is recommended that proposed policy 2.2.8.4 be removed.

b. Current Policy

Settlement area boundary expansions may only occur through a Municipal Comprehensive Review.

Proposed Change

A new policy has been proposed that would allow for a settlement area boundary expansion to occur in advance of a Municipal Comprehensive Review (proposed policy 2.2.8.5), provided the amount of land to be added to the settlement area will be no larger than 40 hectares (proposed policy 2.2.8.6).

Comment

The proposed policy would allow settlement boundary expansions to occur outside a Municipal Comprehensive Review. The land needs assessment undertaken through a MCR is the tool for determining whether there is a need for additional land that can't be accommodated through intensification or development in the DGA's.

It is not clear how changes to the land budget would be addressed in this process, and who would undertake the substantial work of updating the regional land budget, which is guided by a Provincially mandated methodology as set out in policy 2.2.1.5.

Proposed policy 2.2.8.5.e acknowledges this challenge, stating, "the additional lands and associated forecasted growth will be fully accounted for in the land needs assessment associated with the next *Municipal Comprehensive Review*." The proposed policy suggests that Provincial growth targets would not be considered when changes to the urban boundary are proposed, and could be addressed after the boundary had been changed.

In addition, it is not clear whether the additional 40 hectares of lands is meant to be the total amount of land to be expanded across the upper/single tier, or is meant to apply to individual boundary expansions. It is recommended that if used, this number represent a region-wide cap on the amount of additional land that would be considered outside an MCR.

Recommendation

It is recommended that settlement area boundary expansions only occur through a Municipal Comprehensive Review and that proposed policy 2.2.8.5 be removed. If kept, it is recommended that this only occur if municipally initiated by an upper or single tier municipality.

7. Integrated Planning (3.2.1)

Current Policy

The Growth Plan (2017) requires planning for new or expanded infrastructure to occur in an integrated manner, supported by infrastructure master plans, asset management plans, community energy plans, watershed planning, and environmental assessments (policy 3.2.1.2).

Proposed Change

That policy 3.2.1.2 be amended to state that planning for new or expanded infrastructure will occur in an integrated manner, including environmental planning (added). Reference to specific studies (infrastructure master plans, asset

management plans, community energy plans, watershed planning, environmental assessments) was removed and replaced with “environmental planning”.

Comment

It is not clear what the purpose of removing the previously mentioned references is.

Recommendation

Request Provincial staff to clarify the intent of this change.

8. Water and Wastewater Systems /Stormwater Management (3.2.6 - 3.2.7)

Current Policy

Policies that direct how planning of water, wastewater, and stormwater systems are planned are informed by watershed planning.

Proposed Change

The phrase “or equivalent” has been added in instances when referring to watershed planning and a stormwater master plan.

Comment

It is not clear what “equivalent” is meant to refer to.

Recommendation

Request Provincial staff to clarify the intent of this additional language.

9. Protecting What is Valuable – Context (4)

Current Policy

The preamble of this section currently includes the statement “The Province will work with municipalities to develop approaches to inventory, reduce, and offset greenhouse gas emissions in support of provincial targets as we move towards the long-term goal of net-zero communities.”

Proposed Change

The preamble is proposed to be amended by deleting “the long-term goal of net-zero” and replacing it with “environmentally sustainable”.

Comment

The most recent analysis of the Intergovernmental Panel on Climate Change and the UN Emissions Gap Report 2018 clearly articulates a goal of low carbon communities by 2050 to avoid dangerous climate change.

Recommendation

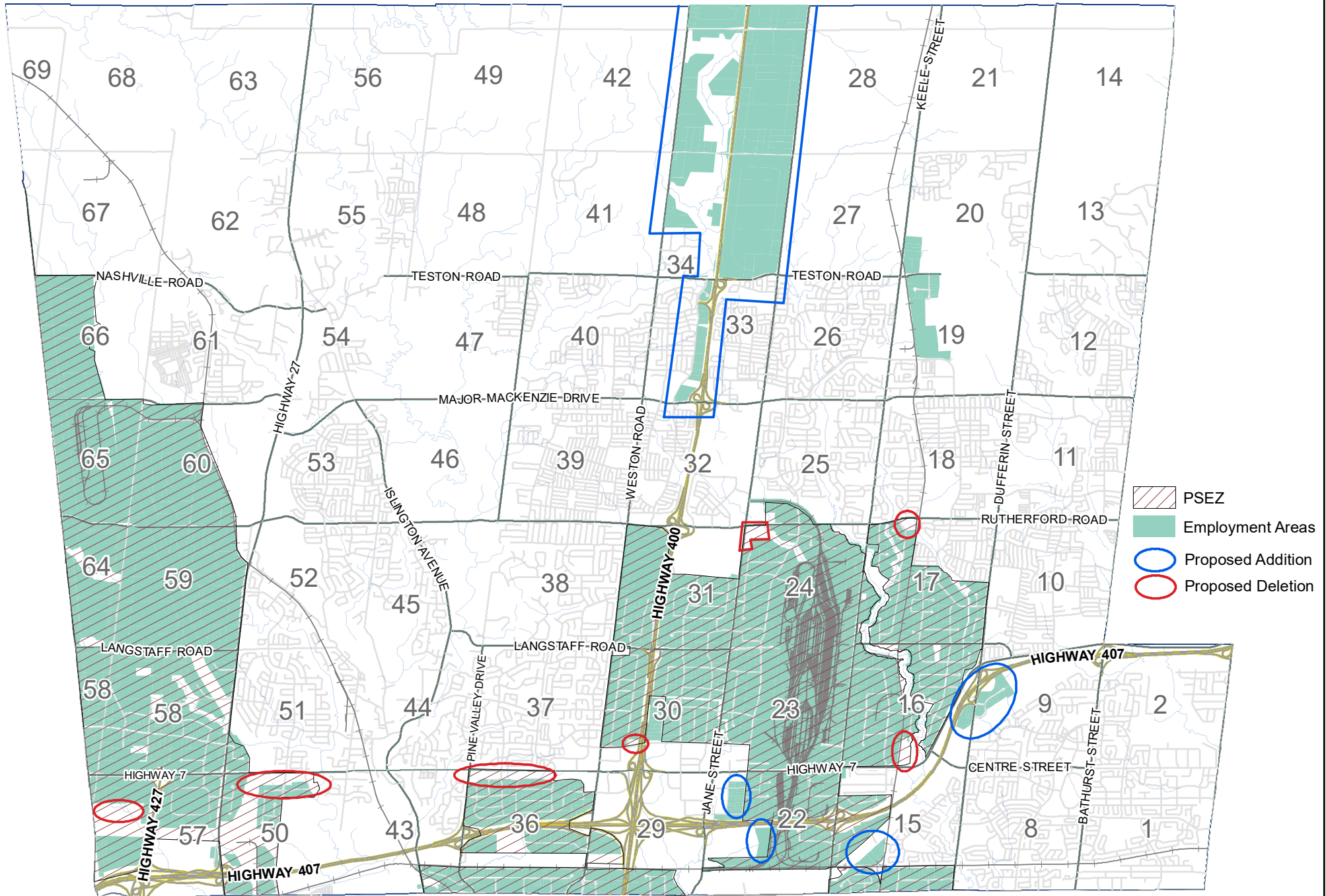
It is recommended that the Province retain the original Growth Plan (2017) wording.

ERO # 013 – 4506**Proposed Framework for Provincially Significant Employment Zones**

Mapping of the proposed Provincially Significant Employment Zones (PSEZ) was distributed by the Province for review and comment. Lands within a PSEZ would not have the ability to be converted to a non-employment use outside of a MCR. The proposed mapping did not include the Highway 400 North Employment Lands and a number of other significant employment areas. Staff are recommending that these lands be identified as a PSEZ, as this area will have significant employment and economic output and needs to be protected. Furthermore, other areas along the Highway 407 corridor were not identified as PSEZ. Staff are also recommending that these lands be included in the PSEZ mapping. These proposed recommendations are illustrated on the attached map.

The attached mapping also includes areas recommended for removal from the PSEZ based on non-employment land use designations.

Attachment 2 Recommended Modifications for Provincially Significant Employment Zones Mapping



0 0.75 1.5 3 Kilometers